# EXHIBIT 63

# Instant Bank Account Confirmation Terms and Conditions

The Instant Bank Account Confirmation Service ("Service") is intended to verify that you are authorized to use the bank account you have linked to your PayPal account. Your use of the Service is subject to the terms of the PayPal User Agreement, the PayPal Privacy Policy, and these Instant Bank Account Confirmation Terms and Conditions. By proceeding to use the Service, you agree to be bound by the Instant Bank Account Confirmation Terms and Conditions.

PROVIDE ACCURATE INFORMATION. You agree to provide true, accurate, current and complete information about yourself and your accounts maintained at third party institutions, and you agree to not misrepresent your identity or your account information.

THIRD PARTY ACCOUNTS. By using the Service, you authorize PayPal and its supplier Yodlee, Inc. ("Yodlee") to access third party sites designated by you, on your behalf, to retrieve information requested by you, or as required by PayPal to confirm your bank account. For all purposes hereof, you hereby grant PayPal and Yodlee a limited power of attorney, and you hereby appoint PayPal and Yodlee as your true and lawful attorney-in-fact and agent, with full power of substitution and re-substitution, for you and in your name, place and stead, in any and all capacities, to access third party internet sites, servers or documents, retrieve information, and use your information, all as described above, with the full power and authority to do and perform each and every act and thing requisite and necessary to be done in connection with such activities, as fully to all intents and purposes as you might or could do in person. YOU ACKNOWLEDGE AND AGREE THAT WHEN PAYPAL OR YODLEE ACCESSES AND RETRIEVES INFORMATION FROM THIRD PARTY SITES, PAYPAL AND YODLEE ARE ACTING AS YOUR AGENT, AND NOT THE AGENT OR ON BEHALF OF THE THIRD PARTY. You agree that third party account providers shall be entitled to rely on the foregoing authorization, agency and power of attorney granted by you. You understand and agree that the Service is not endorsed or sponsored by any third party account providers accessible through Service.

USE OF RESULTS LIMITED. You agree that the results of the Instant Bank Account Confirmation are for use by you and PayPal only in connection with the PayPal Service, on PayPal's website.

DISCLAIMER OF WARRANTIES. THE SERVICE IS PROVIDED ON AN "AS IS" AND "AS AVAILABLE" BASIS WITHOUT ANY REPRESENTATION OF WARRANTY. PAYPAL AND YODLEE EXPRESSLY DISCLAIM ALL WARRANTIES WHETHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF

MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NONINFRINGEMENT.

LIMITATION OF LIABILITY. YOU AGREE THAT NEITHER PAYPAL NOR YODLEE NOR ANY OF THEIR AFFILIATES, ACCOUNT PROVIDERS OR ANY OF THEIR AFFILIATES WILL BE LIABLE FOR ANY INDIRECT, INCIDENTAL, SPECIAL, CONSEQUENTIAL OR EXEMPLARY DAMAGES, INCLUDING, BUT NOT LIMITED TO, DAMAGES FOR LOSS OF PROFITS, GOODWILL, USE, DATA OR OTHER INTANGIBLE LOSSES, EVEN IF PAYPAL OR YODLEE HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, RESULTING FROM THE USE OR THE INABILITY TO USE THE SERVICE OR ANY OTHER MATTER RELATING TO THE SERVICE.

INDEMNIFICATION. You agree to indemnify PayPal and Yodlee and their affiliates from any and all third party claims, liability, damages, expenses and costs (including, but not limited to, reasonable attorneys fees) caused by or arising from your use of the Service, your violation of these terms, and/or your infringement of any intellectual property or other right of anyone.

You agree that Yodlee is a third party beneficiary of the above provisions, with all the rights to enforce such provisions as if Yodlee were a party to this Agreement.

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PROVIDE ACCURATE INFORMATION. You agree to provide true, accurate, current and complete information about yourself and your accounts maintained at third party institutions, and you agree to not misrepresent your identity or your account information.

THIRD PARTY ACCOUNTS. By using the Service, you authorize PayPal and its supplier Yodlee, Inc. ("Yodlee") to access third party sites designated by you, on your behalf, to retrieve information requested by you, or as required by PayPal to confirm your bank account. For all purposes hereof, you hereby grant PayPal and Yodlee a limited power of attorney, and you hereby appoint PayPal and Yodlee as your true and lawful attorney-in-fact and agent, with full power of substitution and re-substitution, for you and in your name, place and stead, in any and all capacities, to access third party internet sites, servers or documents, retrieve information, and use your information, all as described above, with the full power and authority to do and perform each and every act and thing requisite and necessary to be done in connection with such activities, as fully to all intents and purposes as you might or could do in person. YOU ACKNOWLEDGE AND AGREE THAT WHEN PAYPAL OR YODLEE ACCESSES AND RETRIEVES INFORMATION FROM THIRD PARTY SITES, PAYPAL AND YODLEE ARE ACTING AS YOUR AGENT, AND NOT THE AGENT OR ON BEHALF OF THE THIRD PARTY. You agree that third party account providers shall be entitled to rely on the foregoing authorization, agency and power of attorney granted by you. You understand and agree that the Service is not endorsed or sponsored by any third party account providers accessible through Service.

USE OF RESULTS LIMITED. You agree that the results of the Instant Bank Account Confirmation are for use by you and PayPal only in connection with the PayPal Service, on PayPal's website.

DISCLAIMER OF WARRANTIES. THE SERVICE IS PROVIDED ON AN "AS IS" AND "AS AVAILABLE" BASIS WITHOUT ANY REPRESENTATION OF WARRANTY. PAYPAL AND YODLEE EXPRESSLY DISCLAIM ALL WARRANTIES WHETHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF MERCHANTABILITY. FITNESS FOR A PARTICULAR PURPOSE, AND NONINFRINGEMENT.

LIMITATION OF LIABILITY. YOU AGREE THAT NEITHER PAYPAL NOR YODLEE NOR ANY OF THEIR AFFILIATES, ACCOUNT PROVIDERS OR ANY OF THEIR AFFILIATES WILL BE LIABLE FOR ANY INDIRECT, INCIDENTAL, SPECIAL, CONSEQUENTIAL OR EXEMPLARY DAMAGES, INCLUDING, BUT NOT LIMITED TO, DAMAGES FOR LOSS OF PROFITS, GOODWILL, USE, DATA OR OTHER INTANGIBLE LOSSES, EVEN IF PAYPAL OR YODLEE HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, RESULTING FROM THE USE OR THE INABILITY TO USE THE SERVICE OR ANY OTHER MATTER RELATING TO THE SERVICE.

INDEMNIFICATION. You agree to indemnify PayPal and Yodlee and their affiliates from any and all third party claims, liability, damages, expenses and costs (including, but not limited to, reasonable attorneys fees) caused by or arising from your use of the Service, your violation of these terms, and/or your infringement of any intellectual property or other right of anyone.

You agree that Yodlee is a third party beneficiary of the above provisions, with all the rights to enforce such provisions as if Yodlee were a party to this Agreement.

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## Privacy Policy for PayPal Services

Effective Date: July 1, 2015



#### Your Privacy Rights

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to the PayPal website and all related sites, applications, services and tools regardless of how you access or use them.

The PayPal website is a licensee of the TRUSTe Web Privacy Program. In order to view our relationship with TRUSTe, please visit the validation page visible by clicking on the TRUSTe seal. If this policy or our customer support team cannot answer your privacy-related questions, please use the TRUSTe Watchdog Dispute Resolution Process.

The TRUSTe certification applies to only information that is collected through this website.



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### Scope and Consent

You accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively "PayPal Services"). This Privacy Policy is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) unless otherwise agreed through contract. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date. In addition, if the revised version includes a substantial change, we will provide you with

30 days' prior notice by posting notice of the change on the "Policy Updates" page of our website. After this 30-day notice period, you will be considered as having expressly consented to all amendments to this Privacy Policy.

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#### Collection of Personal Information

We collect the following types of personal information in order to provide you with the use of PayPal Services, and to help us personalize and improve your experience.

Information we collect automatically: When you use PayPal Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons (visit How we use Cookies and Similar Technologies for more information).

Information you provide to us: We may collect and store any information you provide us when you use PayPal Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding PayPal Services.

When you use PayPal Services, we also collect information about your transactions and your activities. In addition, if you open a PayPal account or use PayPal Services, we may collect the following types of information:

- Contact information, such as your name, address, phone, email and other similar information.
- Financial information, such as the full bank account numbers and/or credit card numbers that you link to your PayPal account or give us when
  you use PayPal Services.
- · Detailed personal information such as your date of birth or national ID number.

We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the PayPal corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole). Additionally, for quality and training purposes or for its own protection, PayPal may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with PayPal, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

Information from other sources: We may also obtain information about you from third parties such as credit bureaus and identity verification services.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your PayPal account and authorizing PayPal to have access to this information, you agree that PayPal may collect, store and use this information in accordance with this Privacy Policy.

**Authentication and Fraud Detection:** In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with PayPal Services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

Using Your Mobile Device: We may offer you the ability to connect with PayPal Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.

When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's setting's menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

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#### How We Use the Personal Information We Collect

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- provide PayPal Services and customer support;
- · process transactions and send notices about your transactions;
- · verify your identity, including during account creation and password reset processes;
- · resolve disputes, collect fees, and troubleshoot problems;
- · manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- · detect, prevent or remediate violations of policies or applicable user agreements;
- · improve the PayPal Services by customizing your user experience;
- · measure the performance of the PayPai Services and improve their content and layout;
- · manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences;
- contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement;
- perform creditworthiness and solvency checks, compare information for accuracy and verify it with third parties.

We may contact you via electronic means or postal mail to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Additionally, we may contact you to offer coupons, discounts and promotions, and inform you about PayPal Services and the services of our corporate family. Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, autodialed or prerecorded calls and text messages as described in our User Agreement. Where applicable and permitted by law, you may decline to receive certain communications.

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#### Marketing

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your personal information with information we collect from other companies and use it to improve and personalize PayPal Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, simply indicate your preference by logging into your account and going to the Notifications section and updating your preferences, or by following the directions that may be provided within the communication or advertisement.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

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#### How We Use Cookies and Similar Technologies

When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, e-tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use these technologies to recognize you as a customer; customize PayPal Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

Do Not Track: Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals. We do, however, provide you notice of the tracking by advertisers and other third parties in our Privacy and Cookies policies.

For more detailed information on our use of these technologies, please see our policy on Cookies, Web Beacons, and Similar Technologies.

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#### How We Protect and Store Personal Information

Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

We store and process your personal information on our computers in North America, Asia, Europe and elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

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#### How We Share Personal Information with Other PayPal Users

When transacting with others, we may provide those parties with information about you necessary to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction. To facilitate dispute resolution, we may provide a buyer with the seller's address so that goods can be returned to the seller. The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it. Contacting users with unwanted or threatening messages is against our policies and constitutes a violation of our User Agreement.

If someone is sending you money and enters your email address or phone number, we will provide them your registered name so they can verify they are sending the money to the correct account.

We work with third parties, including merchants, to enable them to accept or send payments from or to you using PayPal. In doing so, a third party may share information about you with us, such as your email address or mobile phone number, to inform you that a payment has been sent to you or when you attempt to pay a merchant or third party. We use this information to confirm that you are a PayPal customer and that PayPal as a form of payment can be enabled, or to send you notification of payment status. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so.

If you link your loyalty or gift card of a PayPal merchant to your account, we may share your card number with that merchant when you pay using PayPal.

Please note that merchants, sellers, and users you buy from or contract with have their own privacy policies, and although PayPal's user agreement does not allow the other transacting party to use this information for anything other than providing PayPal Services, PayPal is not responsible for their actions, including their information protection practices.

Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you using PayPal, or with the third parties that offer or use PayPal Services, except with your express permission or if we are required to do so to comply with credit card rules, a subpoena, or other legal process.

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#### How We Share Personal Information with Other Third Parties

We may share your personal information we collect from you, including your name, contact details, and transactions and activities, with:

• Members of the PayPal corporate family, such as PayPal Credit, Venmo or Braintree, to provide joint content, products, and services (such as registration, transactions and customer support), to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services, and communications. Members of our corporate family will use this information to send you marketing communications only if you have requested their services. Financial institutions that we partner with to jointly create and offer a product (including but not limited to, the PayPal Extras credit card where we share information with GE Capital to determine whether you

should receive pre-approved offers for the PayPal Extras credit card). These financial institutions may only use this information to market PayPal-related products, unless you have given consent for other uses.

- Credit bureaus and collection agencies to report account information, as permitted by law.
- Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you meet
  their criteria which includes having PayPal close your PayPal Account due to your breach of the PayPal User Agreement).
- Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity
  follow this Privacy Policy with respect to your personal information. If your personal information could be used contrary to this policy, you will
  receive prior notice.)
- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement
  applicable to PayPal or one of its affiliates; when we need to do so to comply with law or credit card rules; or when we believe, in our sole
  discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal
  activity or to investigate violations of our User Agreement.
- · Other unaffiliated third parties, for the following purposes:
  - <u>Fraud Prevention and Risk Management</u>: to help prevent fraud or assess and manage risk. For example, if you use the PayPal Services
    to buy or sell goods using eBay Inc. or its affiliates ("eBay"), we may share account information in order to help protect your accounts
    from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary account information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share account information with eBay to enable them to operate their programs for evaluating buyers or sellers.

- <u>Customer Service</u>: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
- . Shipping: in connection with shipping and related services for purchases made using PayPal.
- Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- <u>Service Providers</u>: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill
  collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your
  information in connection with the services they perform for us and not for their own benefit.
- · Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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#### Using Log In with PayPal

Log In with PayPal is a tool we've developed to improve your Internet experience. Log In with PayPal allows you to streamline and simplify the account creation and login process when using third-party websites, and it allows these websites to enhance your experience on their sites. Instead of creating multiple usernames and passwords for each website you visit, Log In with PayPal allows you to sign in to a participating website using your existing PayPal login information. When you use Log In with PayPal, you agree that PayPal can share the information listed on the Log In with PayPal consent screen or in your Log In with PayPal account settings with the participating website. Information you allow PayPal to share with these third-party websites is subject to each third-party's terms of service and privacy agreement, so you are encouraged to review their policies.

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# How You Can Access or Change Your Personal Information

You can review and edit your personal information at any time by logging in to your account and reviewing your account settings and profile. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed," but may retain personal information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain personal information from your account to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.

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#### How You Can Contact Us about Privacy Questions

If you have questions or concerns regarding this Privacy Policy, you should contact us by using this form.

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# Privacy Policy for PayPal Services

Effective Date: October 1, 2015

Print

#### Your Privacy Rights

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to the PayPal website and all related sites, applications, services and tools regardless of how you access or use them.

The PayPal website is a licensee of the TRUSTe Web Privacy Program. In order to view our relationship with TRUSTe, please visit the validation page visible by clicking on the TRUSTe seal. If this policy or our customer support team cannot answer your privacy-related questions, please use the TRUSTe Watchdog Dispute Resolution Process.

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#### Scope and Consent

You accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively "PayPal Services"). This Privacy Policy is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) unless otherwise agreed through contract. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date. In addition, if the revised version includes a substantial change, we will provide you with 30 days' prior notice by posting notice of the change on the "Policy Updates" page of our website. After this 30-day notice period, you will be considered as having expressly consented to all amendments to this Privacy Policy.

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Information we collect automatically: When you use PayPal Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons (visit How we use Cookies and Similar Technologies for more information).

Information you provide to us: We may collect and store any information you provide us when you use PayPal Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding PayPal Services.

When you use PayPal Services, we also collect information about your transactions and your activities. In addition, if you open a PayPal account or use PayPal Services, we may collect the following types of information:

- Contact information, such as your name, address, phone, email and other similar information.
- Financial information, such as the full bank account numbers and/or credit card numbers that you link to your PayPal
  account or give us when you use PayPal Services.
- · Detailed personal information such as your date of birth or national ID number.

We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the PayPal corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole). Additionally, for quality and training purposes or for its own protection, PayPal may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with PayPal, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

Information from other sources: We may also obtain information about you from third parties such as credit bureaus and identity verification services.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your PayPal account and authorizing PayPal to have access to this information, you agree that PayPal may collect, store and use this information in accordance with this Privacy Policy.

Authentication and Fraud Detection: In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with PayPal Services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

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When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's setting's menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

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- manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- · improve the PayPal Services by customizing your user experience;
- measure the performance of the PayPal Services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences;
- contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement;
- perform creditworthiness and solvency checks, compare information for accuracy and verify it with third parties.

We may contact you via electronic means or postal mail to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Additionally, we may contact you to offer coupons, discounts and promotions, and inform you about PayPal Services and the services of our corporate family. Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, autodialed or prerecorded calls and text messages as described in our User Agreement. Where applicable and permitted by law, you may decline to receive certain communications.

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#### Marketing

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your personal information with information we collect from other companies and use it to improve and personalize PayPal Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, simply indicate your preference by logging into your account and going to the Notifications section and updating your preferences, or by following the directions that may be provided within the communication or advertisement.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

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#### How We Use Cookies and Similar Technologies

When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, e-tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use these technologies to recognize you as a customer; customize PayPal Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

Do Not Track: Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals. We do, however, provide you notice of the tracking by advertisers and other third parties in our Privacy and Cookies policies.

For more detailed information on our use of these technologies, please see our policy on Cookies, Web Beacons, and Similar Technologies.

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#### How We Protect and Store Personal Information

Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

We store and process your personal information on our computers in North America, Asia, Europe and elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

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#### How We Share Personal Information with Other PayPal Users

When transacting with others, we may provide those parties with information about you necessary to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction. To facilitate dispute resolution, we may provide a buyer with the seller's address so that goods can be returned to the seller. The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it. Contacting users with unwanted or threatening messages is against our policies and constitutes a violation of our User Agreement.

If someone is sending you money and enters your email address or phone number, we will provide them your registered name so they can verify they are sending the money to the correct account.

We work with third parties, including merchants, to enable them to accept or send payments from or to you using PayPal. In doing so, a third party may share information about you with us, such as your email address or mobile phone number, to inform you that a payment has been sent to you or when you attempt to pay a merchant or third party. We use this information to confirm that you are a PayPal customer and that PayPal as a form of payment can be enabled, or to send you notification of payment status. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so.

If you link your loyalty or gift card of a PayPal merchant to your account, we may share your card number with that merchant when you pay using PayPal.

Please note that merchants, sellers, and users you buy from or contract with have their own privacy policies, and although PayPal's user agreement does not allow the other transacting party to use this information for anything other than providing PayPal Services, PayPal is not responsible for their actions, including their information protection practices.

Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you using PayPal, or with the third parties that offer or use PayPal Services, except with your express permission or if we are required to do so to comply with credit card rules, a subpoena, or other legal process.

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#### How We Share Personal Information with Other Third Parties

We may share your personal information we collect from you, including your name, contact details, and transactions and activities, with:

- Members of the PayPal corporate family, such as PayPal Credit, Venmo or Braintree, to provide joint content, products, and services (such as registration, transactions and customer support), to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services, and communications. Members of our corporate family will use this information to send you marketing communications only if you have requested their services. Financial institutions that we partner with to jointly create and offer a product (including but not limited to, the PayPal Extras credit card where we share information with Synchrony Bank, for example, in connection with preapproved offers for the PayPal Extras credit card). These financial institutions may only use this information to market PayPal-related products, unless you have given consent for other uses.
- Credit bureaus and collection agencies to report account information, as permitted by law.
- Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the
  event that you meet their criteria which includes having PayPal close your PayPal Account due to your breach of the
  PayPal User Agreement).
- Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information

could be used contrary to this policy, you will receive prior notice.)

- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal
  process or requirement applicable to PayPal or one of its affiliates; when we need to do so to comply with law or credit
  card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent
  physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.
- Other unaffiliated third parties, for the following purposes:
  - <u>Fraud Prevention and Risk Management</u>: to help prevent fraud or assess and manage risk. For example, if you use
    the PayPal Services to buy or sell goods using eBay Inc. or its affiliates ("eBay"), we may share account information in
    order to help protect your accounts from fraudulent activity, alert you if we detect such fraudulent activity on your
    accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary account information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share account information with eBay to enable them to operate their programs for evaluating buyers or sellers.

- <u>Customer Service</u>: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
- · Shipping: in connection with shipping and related services for purchases made using PayPal.
- <u>Legal Compliance</u>: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- Service Providers: to enable service providers under contract with us to support our business operations, such as
  fraud prevention, bill collection, marketing, customer service and technology services. Our contracts dictate that
  these service providers only use your information in connection with the services they perform for us and not for
  their own benefit.
- · Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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## Using Log In with PayPal

Log In with PayPal is a tool we've developed to improve your Internet experience. Log In with PayPal allows you to streamline and simplify the account creation and login process when using third-party websites, and it allows these websites to enhance your experience on their sites. Instead of creating multiple usernames and passwords for each website you visit, Log In with PayPal allows you to sign in to a participating website using your existing PayPal login information. When you use Log In with PayPal, you agree that PayPal can share the information listed on the Log In with PayPal consent screen or in your Log In with PayPal account settings with the participating website. Information you allow PayPal to share

with these third-party websites is subject to each third-party's terms of service and privacy agreement, so you are encouraged to review their policies.

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#### How You Can Access or Change Your Personal Information

You can review and edit your personal information at any time by logging in to your account and reviewing your account settings and profile. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed," but may retain personal information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain personal information from your account to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.

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### How You Can Contact Us about Privacy Questions

If you have questions or concerns regarding this Privacy Policy, you should contact us by using this form.

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 $The Wayback Machine - https://web.archive.org/web/20171210020655/https://www.paypal.com/us/webapps/mpp/ua/privacy-full?locale.x = en_US - https://web.archive.org/web/20171210020655/https://www.paypal.com/us/webapps/mpp/ua/privacy-full?locale.x = en_US - https://www.paypal.com/us/webapps/mpp/ua/privacy-full?locale.x = en_US - https://www.paypal.com/us/webapps/mpp/us/privacy-full?locale.x = en_US - https://www.paypal.com/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapps/mpp/us/webapp$ 

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# Privacy Policy for PayPal Services

Effective Date: March 29, 2017



Your Privacy Rights

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to the PayPal website and all related sites, applications, services and tools regardless of how you access or use them.

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Scope and Consent
Collection of Personal Information
How We Use the Personal Information We Collect
Marketing
How We Use Cookies and Similar Technologies
How We Protect and Store Personal Information
How We Share Personal Information with Other PayPal Users
How We Share Personal Information with Other Third Parties
Using Log In with PayPal
How You Can Access or Change Your Personal Information
How You Can Contact Us about Privacy Questions

### Scope and Consent

You accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively "PayPal Services"). This Privacy Policy applies US law and is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) in the United States, unless otherwise agreed through contract. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date. In addition, if the revised version includes a substantial change, we will provide you with 30 days' prior notice by posting notice of the change on the "Policy Updates" page of our website. After this 30-day notice period, you will be considered as having expressly consented to all amendments to this Privacy Policy.

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#### Collection of Personal Information

We collect the following types of personal information in order to provide you with the use of PayPal Services, and to help us personalize and improve your experience.

Information we collect automatically: When you use PayPal Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons (visit How we use Cookies and Similar Technologies for more information).

Information you provide to us: We may collect and store any information you provide us when you use PayPal Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding PayPal Services.

When you use PayPal Services, we also collect information about your transactions and your activities. In addition, if you open a PayPal account or use PayPal Services, we may collect the following types of information:

Contact information, such as your name, address, phone, email and other similar information.

Financial information, such as the full bank account numbers and/or credit card numbers that you link to your PayPal account or give us when you use PayPal Services.

Detailed personal information such as your date of birth or national ID number.

We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the PayPal corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole). Additionally, for quality and training purposes or for its own protection, PayPal may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with PayPal, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

Information from other sources: We may also obtain information about you from third parties such as credit bureaus and identity verification services.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your PayPal account and authorizing PayPal to have access to this information, you agree that PayPal may collect, store and use this information in accordance with this Privacy Policy.

Authentication and Fraud Detection: In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with PayPal Services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

Using Your Mobile Device: We may offer you the ability to connect with PayPal Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.

When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's setting's menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

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#### How We Use the Personal Information We Collect

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

provide PayPal Services and customer support;

process transactions and send notices about your transactions;

verify your identity, including during account creation and password reset processes;

resolve disputes, collect fees, and troubleshoot problems;

manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;

detect, prevent or remediate violations of policies or applicable user agreements;

improve the PayPal Services by customizing your user experience;

measure the performance of the PayPal Services and improve their content and layout;

manage and protect our information technology infrastructure;

provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences; contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement; perform creditworthiness and solvency checks, compare information for accuracy and verify it with third parties.

We may contact you via electronic means or postal mail to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service

your account. Additionally, we may contact you to offer coupons, discounts and promotions, and inform you about PayPal Services and the services of our corporate family. Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. To reach you as efficiently as possible, we may contact you via phone, and may use autodialed or prerecorded calls and text messages as described in our User Agreement. Where applicable and permitted by law, you may decline to receive certain communications.

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#### Marketing

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your personal information with information we collect from other companies and use it to improve and personalize PayPal Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, simply indicate your preference by logging into your account and going to the Notifications section and updating your preferences, or by following the directions that may be provided within the communication or advertisement.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

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#### How We Use Cookies and Similar Technologies

When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, e-tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use these technologies to recognize you as a customer; customize PayPal Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

Do Not Track: Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals. We do, however, provide you notice of the tracking by advertisers and other third parties in our Privacy and Cookies policies.

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#### How We Protect and Store Personal Information

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Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, the use of third-party service providers. We, and third-party service providers on our behalf, store and process your personal information in the United States and elsewhere in the world. If your information is transferred to other countries, including countries which may not have data protection laws that provide the same level of protection that exists in your country, we will protect the information as described in this Privacy Policy.

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to data centers, and information access authorization controls.

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How We Share Personal Information with Other PayPal Users

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If someone is sending you money and enters your email address or phone number, we will provide them your registered name so they can verify they are sending the money to the correct account.

We work with third parties, including merchants, to enable them to accept or send payments from or to you using PayPal. In doing so, a third party may share information about you with us, such as your email address or mobile phone number, to inform you that a payment has been sent to you or when you attempt to pay a merchant or third party. We use this information to confirm that you are a PayPal customer and that PayPal as a form of payment can be enabled, or to send you notification of payment status. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so.

If you link your loyalty or gift card of a PayPal merchant to your account, we may share your card number with that merchant when you pay using PayPal.

Please note that merchants, sellers, and users you buy from or contract with have their own privacy policies, and although PayPal's user agreement does not allow the other transacting party to use this information for anything other than providing PayPal Services, PayPal is not responsible for their actions, including their information protection practices.

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Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you meet their criteria which includes having PayPal close your PayPal Account due to your breach of the PayPal User Agreement).

Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice.)

Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to PayPal or one of its affiliates; when we need to do so to comply with law or credit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.

Other unaffiliated third parties, for the following purposes:

Fraud Prevention and Risk Management: to help prevent fraud or assess and manage risk. For example, if you use the PayPal Services to buy or sell goods
using eBay Inc. or its affiliates ("eBay"), we may share account information in order to help protect your accounts from fraudulent activity, alert you if we
detect such fraudulent activity on your accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary account information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share account information with eBay to enable them to operate their programs for evaluating buyers or sellers.

- <u>Customer Service</u>: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
- Shipping: in connection with shipping and related services for purchases made using PayPal.
- · Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- Service Providers: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection,
  marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the
  services they perform for us and not for their own benefit.

Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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#### Using Log In with PayPal

Log In with PayPal is a tool we've developed to improve your Internet experience. Log In with PayPal allows you to streamline and simplify the account creation and login process when using third-party websites, and it allows these websites to enhance your experience on their sites. Instead of creating multiple usernames and passwords for each website you visit, Log In with PayPal allows you to sign in to a participating website using your existing PayPal login information. When you use Log In with PayPal, you agree that PayPal can share the information listed on the Log In with PayPal consent screen or in your Log In with PayPal account settings with the participating website. Information you allow PayPal to share with these third-party websites is subject to each third-party's terms of service and privacy agreement, so you are encouraged to review their policies.

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#### How You Can Access or Change Your Personal Information

You can review and edit your personal information at any time by logging in to your account and reviewing your account settings and profile. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed," but may retain personal information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain personal information from your account to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.

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# How You Can Contact Us about Privacy Questions

If you have questions or concerns regarding this Privacy Policy, you should contact us by using this form.

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# Privacy Policy for PayPal Services

Effective Date: April 27, 2017

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- 3. How We Use the Information We Collect
- 4. Marketing
- 5. How We Share Information with Other PayPal Users
- 6. How We Share Information with Other Third Parties
- 7. Cross Border Transfers of Information
- 8. Your Use of Information and PayPal Services
- 9. Information Security
- 10. Accessing and Changing Your Information
- 11. Accountability

Please view, read, download and save this Privacy Policy

This Privacy Policy governs your use of products, services, content, features, technologies or functions offered by PayPal and all related sites, applications, and services (collectively "PayPal Services") (including, without limitation, when you provide any information in relation to your use of PayPal Services).

You accept and consent to this Privacy Policy when you sign up for, access, or use the PayPal Services. By accepting and consenting to this Privacy Policy, you expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.

#### 1. Overview

In order to operate the PayPal Services and to reduce the risk of fraud, PayPal (Europe) S.à r.l. et Cie, S.C.A. ("PayPal", "our", "us" or "we"), the data controller, must ask you to provide us with information about yourself, including your credit or debit card and/or bank account details. By consenting to, and agreeing the terms of, this Privacy Policy, you expressly consent and agree to us processing your data in the manner set out herein. This Privacy Policy describes the information we collect and how we use that information. PayPal takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Policy. For the purposes of this Privacy Policy, the term "information" means any confidential and/or personally identifiable information or other information related to users of PayPal Services, including but not limited to customers and merchants (legal entities).

We will not sell or rent your information to third parties for their marketing purposes without your explicit consent. However, in order for us to offer PayPal Services to our users; enhance the quality of PayPal Services from time to time; and protect the interests of our users, we will in limited circumstances share some of your information with third parties under strict restrictions, as described in more detail in Sections 3, 5, and 6 of this Privacy Policy. It is important for you to review this Privacy Policy as it applies to all the PayPal Services.

This Privacy Policy is intended to govern the use of PayPal Services by our users (including, without limitation those who use the PayPal Services in the course of their trade or business) unless otherwise agreed through contract.

Changes to this Privacy Policy: All future changes to this Privacy Policy set out in the Policy Update already published on the "Legal Agreements" landing page of the PayParwebsite at the Parwebsite of the Policy Update. "Policy Update" means a prior notice of changes to any of your agreements with PayPal which PayPal may make available to you in writing. If you disagree with the terms of this Privacy Policy, please do not register for or use the PayPal Services.

Notification of Changes: This Privacy Policy may be revised over time as new features are added to the PayPal Services or as we incorporate suggestions from our customers. We may change this Privacy Policy at any time by posting a revised version of it on our website. Unless we have legal grounds to do otherwise, we will provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. We may post the notice on the "Policy Updates" page of our website(s) and/or send the notice by e-mail. As of the effective date of the revised privacy policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

Please check the PayPal website here on a regular basis for the most current version of our Privacy Policy.

Third Party Websites: Some pages on the PayPal website include links to third-party websites. These sites are governed by their own privacy statements, and PayPal is not responsible for their operations, including but not limited to their information practices. Users submitting information to or through these third-party websites should review the privacy statements of these sites before providing them with personally identifiable information.

Not a Framework Contract: For the avoidance of doubt, this Privacy Policy does not constitute a "framework contract" for the purpose of the EU Payment Services Directive (2007/64/EC) or any implementation of that directive in the European Union or EEA (including, without limitation, the UK Payment Services Regulations 2009).

A Special Note about Children: Children are not eligible to use PayPal Services and we ask that minors (persons under the age of 18) do not submit any personal information to us or use the PayPal Services.

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#### 2 Information We Collect

Required Information: To open a PayPal account or use the PayPal Services, you must provide your name, address, phone number, and email address. In order to make payments through the PayPal Services, you must provide credit card, debit card or bank account information. We also ask you to choose two different security questions to answer (such as your city of birth or your pet's name).

We will also require other commercial and/or identification information if you send or receive certain high-value transactions or high overall payment volumes through the PayPal Services or as is otherwise required in order for us to comply with our anti-money laundering obligations under European law.

**Using your device**: When you use PayPal Services using any device (whether connected to PayPal wirelessly or by a fixed line or otherwise), we may additionally collect and store device sign-on data (including but not limited device ID) and geolocation data in order to provide PayPal Services.

Photographs: If you use certain functionalities provided by us (including, without limitation, PayPal POS functionality on your mobile app) we may ask you to upload a picture of you in order to provide these specific services. Your face must be recognisable. Your image is solely your responsibility.

Loyalty Information: If we allow you to link your membership of an eligible loyalty scheme to your account, we may require you to provide to us your loyalty scheme membership ID.

**Transaction Information:** When you use the PayPal Services to send money to someone else or request money from someone else, we ask you to provide information related to that transaction. This information includes the amount and type of the transaction (purchase of goods, purchase of services, or simple money transfer), other purchase details and the email address, or phone number of the third party. Also, when you send money to another PayPal customer, you may be asked to provide personal details to that customer to complete the transaction. Those details may also be passed on to us from that customer. We also collect the Internet address (IP address) and other identifying information about the computer or device you use to access your PayPal account or use the PayPal Services, in order to help detect possible instances of unauthorised transactions.

**Information About You From Third Parties**: In order to protect all our customers against potential fraud, we verify the information you provide with **Payment Processors** and/or **Credit Reference and Fraud Agencies**. In the course of such verification, we receive personally identifiable information about you from such services. In particular, if you register a credit card or debit card or bank account with PayPal, we

will use card authorisation and fraud screening services to verify that your bank or card information and address match the information you supplied to PayPal, GARANA : ARC GARANA STATE TO THE PARTY OF THE PARTY O

If you send or receive high overall payment volumes through the PayPal Services, or if as a merchant have limited selling history, in some circumstances we will conduct a background check on your business by obtaining information about you and your business, and potentially (if legally permitted) also about your directors, shareholders and partners, from a **credit reference or fraud agency**. If you owe us money, we may conduct a credit check on you by obtaining additional information about you from a credit reference or fraud agency, to the extent permitted by law. PayPal, at its sole discretion, reserves the right to periodically retrieve and review a business and/or consumer credit report supplied by such credit reference or fraud agency for any account, and reserves the right to close an account based on information obtained during this credit review process.

If you use your PayPal account to sell items, we may also collect public information about your business and your behaviour on social media platforms (such as the e-mail address and the number of "likes" and "followers"), to the extent relevant to confirm an assessment of your transactions and/or your business, including its size and the size of its customer base.

Information About You from Other Sources: We may also collect information about you from other sources, including from members of PayPal's corporate family, other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole).

**Additional Verification:** If we cannot verify the information that you provide, or if you request a withdrawal by cheque to an address other than your verified credit card billing address, we may ask you to upload or send us additional information by fax (such as your driving licence, credit card statement, and/or a recent utility bill, or other information linking you to the applicable address), or to answer additional questions online to help verify your information.

**Website Traffic Information:** Because of the way Internet communication standards work, when you arrive at or leave the PayPal website, we automatically receive the web address of the site that you came from or are going to. We also collect information on which pages of our website you visit, IP addresses, the type of browser you use and the times you access our website.

Cookies, Web Beacons, Local Storage and Similar Technologies: When you access our website or use PayPal Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use Cookies to recognise you as a customer, customise PayPal Services, content and advertising, measure promotional effectiveness, help ensure that your account security is not compromised, mitigate risk and prevent fraud, and to promote trust and safety across our sites and PayPal Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and PayPal Services.

For more detailed information on our use of these technologies, please see our policy on Cookies, Web Beacons, and Similar Technologies.

**Communications**: When you communicate with us for customer service or other purposes (e.g., by emails, faxes, phone calls, tweets, etc.), we retain such information and our responses to you in the records of your account.

Questionnaires, Surveys, Sweepstakes and Profile Data: From time to time, we offer optional questionnaires, surveys and sweepstakes to our users for such purposes as collecting demographic information or assessing users' interests and needs. If we collect personally identifiable information from our users in these questionnaires, surveys, and sweepstakes, the users will be given notice of how the information will be used prior to their participation in the survey, questionnaire or sweepstake.

Individuals who are not Registered Users of PayPal Services and Requests: When a registered user of the PayPal Services attempts to engage an individual who is not a registered user of the PayPal Services in a transaction (for instance, by sending a payment or other benefit to, or requesting a payment from that individual), we will retain the information that the registered user of the PayPal Services submits to us, including, for example, the other party's email address, phone number and/or name. Although this particular information is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person. Additionally, these persons have the same rights to access and correct information about themselves (assuming that their details were correct) as anyone else who uses the PayPal Services.

**Account Information**: For the purposes of this Privacy Policy, account information ("Account Information") includes without limitation: name, address, email address, phone number, username, photograph, IP address, device ID, geolocation information, account numbers, account types, details of funding instruments associated with the account, details of payment transactions, details of commercial transactions, customer statements and reports, account preferences, details of identity collected as part of our "know your customer" checks on you, and customer correspondence.

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#### How We Use the Information We Collect

Internal Uses: We collect, store and process your information on servers located in the United States and elsewhere in the world where PayPal facilities are located. Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient, and customised experience. You agree that we may use your personal information to:

- process transactions and provide the PayPal Services;
- · verify your identity, including during account creation and password reset processes;
- · resolve disputes, collect fees, and troubleshoot problems;
- · manage risk, or to detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- provide you with customer support services;
- improve the PayPal Services by customizing your user experience;
- · measure the performance of the PayPal Services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service updates, and deliver promotional offers based on the communication
  preferences you have defined for your PayPal account (please refer to the section "Our Contact with PayPal Customers" below) and your
  activities when using the PayPal Services; and
- · perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties.

Questionnaires, Sweepstakes, Surveys and Profile Data: If you choose to answer our optional questionnaires or surveys, we may use such information to improve PayPal Services, send you marketing or advertising information, manage the sweepstakes, or as otherwise explained in detail in the survey itself.

Our Contact with PayPal Customers: We communicate with our users on a regular basis via email to provide requested services. We also communicate with our users by phone to:

- · resolve customer complaints or claims made by users via the PayPal Services;
- respond to requests for customer service;
- inform users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- · confirm information concerning a user's identity, business or account activity;
- · carry out collection activities;
- conduct customer surveys; and
- investigate suspicious transactions.

We use your email or physical address to confirm your opening of a PayPal account, to send you notice of payments that you send or receive through PayPal (including referral payments described below), to send you information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

We also use your email address to send you other types of communications that you can control, including "News from PayPal", auction tips, customer surveys and notice of special third-party promotions. You can choose whether to receive some, all or none of these communications when you complete the registration process, or at any time thereafter, by logging in to your account on the PayPal website, selecting My Account, Profile, then My account settings, and updating your Communication preferences.

We may communicate with you as described above by SMS (and SMS will be treated as an email for the purpose of managing your Communication Preferences).

In connection with independent audits of our financial statements and operations, the auditors may seek to contact a sample of our customers to confirmation our file of the solution of the sample of our purposes.

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#### 4. Marketing

We may combine your information with information we collect from other companies and use it to improve and personalise the PayPal Services. If you don't wish to receive marketing communications from us or participate in our ad-customisation programmes, simply log in to your account, select My Account, Profile, then Notification settings and update your Communication preferences, or follow the directions provided with the communication or advertisement.

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#### 5. How We Share Information with Other PayPal Users

If you are a registered PayPal user, your name, email address, phone number (if applicable) date of sign-up, the number of payments you have received from verified PayPal users, and whether you have been verified to have control of a bank account are made available to other PayPal customers whom you have paid or senders who are attempting to pay you using the PayPal Services. If you are a Business account holder, we will also display to other PayPal customers the website address (URL) and customer service contact information that you provide us. In addition, this and other information may also be shared with third parties when you use these third parties to access the PayPal Services. However, your credit card number, bank account and other financial information will not be revealed to anyone whom you have paid or who has paid you through the PayPal Services or third parties that use the PayPal Services, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process.

If you are buying goods or services and pay through PayPal, we may provide the seller with the delivery address for the goods and your billing address to complete your transaction. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

If you are using your mobile app, we may share your picture that you have stored with your mobile app with other PayPal users so that they can identify you. You license us to use your image for the above purposes on a non-exclusive, worldwide, royalty-free, transferable and sub-licensable basis.

We may also share with other users the fact that you are within local reach as a customer. If you do not want this information to be shared, you can access, view and control the settings for any such data on your mobile device.

If you use PayPal as means of logging into external websites or mobile apps, we may share your login status with any third party offering this Service as a login method, as well as the personal and other Account Information that you consent to being shared so that the third party can recognise you. PayPal will not give such third party access to your PayPal Account and will only make payments from your Account to that third party with your specific authorisation. You can access, view and control the settings for any such data sharing with merchants when logged into your PayPal account.

If you link your membership of an eligible loyalty scheme to your Account in our mobile app, we may share your loyalty scheme membership ID with any merchant participating in the relevant loyalty scheme when you pay that merchant using PayPal. If you remove your loyalty scheme membership ID from your Account, we will stop sharing this information.

We work with third parties including merchants to enable them to accept or facilitate payments from or to you using the PayPal Services. In doing so, a third party may share information about you with us such as your email address or phone number, when a payment is sent to you or when you are attempting to pay that third party. We use this information to confirm that you are a PayPal customer and that PayPal can be enabled to make a payment, or where a payment is sent to you to send you a notification that you have received a payment. Also, if you request that we validate your status as a PayPal customer with a third party, we will do so. Please note that third parties you buy from and contract with may have their own privacy policies, and PayPal is not responsible for their operations, including but not limited to their information practices.

If you open a PayPal account directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly through the PayPal Services) will be shared with the owner of such third party website or application and your

information may be subject to their privacy policies.

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By accepting this Privacy Policy, you expressly agree and consent that each time you pay or attempt to pay another PayPal customer (including a merchant) using your PayPal account, PayPal may transfer the aforementioned relevant data to such PayPal customer, who may be located outside the European Economic Area (EEA), in order to process, execute or otherwise deal with and provide information about the payment. You also expressly agree and consent to PayPal providing transactional information and other information necessary for the use of a PayPal mobile application (including point of sale products) to a merchant or another PayPal customer who you have explicitly selected or chosen using the PayPal mobile application or point of sale product.

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#### 6. How We Share Information with Other Third Parties

Just like most banks or financial/payment service providers, PayPal works with third-party service providers which provide important functions to us that allow us to be an easier, faster, and safer way to make payments, and other business partners. We need to disclose user data to them from time to time so that the services can be performed.

In general, the Luxembourg laws to which PayPal's handling of user data is subject (data protection and bank secrecy) require a higher degree of transparency than most other EU laws. This is why, unlike the vast majority of providers of internet-based services or financial services in the EU, PayPal has listed in this Privacy Policy the third party service providers and business partners to whom we may disclose your data, together with the purpose of disclosure and type of information disclosed. You will find a link to those third parties here as well as in paragraphs a, d and g below. By accepting this Privacy Policy and maintaining an account with PayPal, you expressly consent to the transfer of your data to those third parties for the purposes listed.

PayPal may update the list of third parties referred to above every quarter (January 1st, April 1st, July 1st and October 1st). PayPal will only start transferring any data to any of the new entities or for the new purposes or data types indicated in each update after 30 days from the date when that list is made public through this Privacy Policy. You should review the list each quarter on the PayPal website on the dates stated above. If you do not object to the new data disclosure, within 30 days after the publication of the updated list of third parties, you are deemed to have accepted the changes to the list and to this Privacy Policy. If you do not agree with the changes, you may close your account and stop using our services.

PayPal will not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent, and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy. This includes transfers of data to non-EEA member states.

In order to provide the PayPal Services, certain of the information we collect (as set out in section 2) may be required to be transferred to other PayPal group entities or other entities, including those referred to in section 6 in their capacity as payment providers, payment processors or account holders (or similar capacities). You acknowledge that according to their local legislation, such entities may be subject to laws, regulations, inquiries, investigations, or orders which may require the disclosure of information to the relevant authorities of the relevant country. Your use of the PayPal Services constitutes your consent to our transfer of such information to provide you the PayPal Services.

Specifically, you consent to and direct PayPal to do any and all of the following with your information:

a. Disclose necessary information to: the police and other law enforcement agencies; security forces; competent governmental, intergovernmental or supranational bodies; competent agencies (other than tax related authorities), departments, regulatory authorities, self-regulatory authorities or organisations (including, without limitation, the Agencies referenced in the "Agencies" section of the Third Party Provider List here) and other third parties, including PayPal Group companies, that (i) we are legally compelled and permitted to comply with, including but without limitation the Luxembourg laws of 24 July 2015 on the US Foreign Account Tax Compliance Act ("FATCA Law") and 18 December 2015 on the OECD common reporting standard ("CRS Law"); (ii) we have reason to believe it is appropriate for us to cooperate with in investigations of fraud or other illegal activity or potential illegal activity, or (iii) to conduct investigations of violations of our User Agreement (including without limitation, your funding source or credit or debit card provider). If you are covered by the FATCA or CRS Law, we are required to give you notice of the information about you that we may transfer to various authorities. Please read more about PayPal's obligations under the FATCA and CRS Law and how they could affect you as well as take note of the information we may disclose as result.

We and other organisations, including parties that accept PayPal, may also share, access and use (including from other countries) necessary information (including, without limitation the information recorded by fraud prevention agencies) to help us and them assess and to manage risk (including, without limitation, to prevent fraud, money laundering and terrorist financing). Please contact us if you

- want to receive further details of the relevant fraud prevention agencies. For more information on these Agencies, fraud prevention agencies and other parties, classically appears. SK Document 698-56 Filed 03/12/25 Page 30 of 124
- b. Disclose Account Information to intellectual property right owners if under the applicable national law of an EU member state they have a claim against PayPal for an out-of-court information disclosure due to an infringement of their intellectual property rights for which PayPal Services have been used (for example, but without limitation, Sec. 19, para 2, sub-section 3 of the German Trademark Act or Sec. 101, para 2, sub-section 3 of the German Copyright Act).
- c. Disclose necessary information in response to the requirements of the credit card associations or a civil or criminal legal process.
- d. If you as a merchant use a third party to access or integrate PayPal, we may disclose to any such partner necessary information for the purpose of facilitating and maintaining such an arrangement (including, without limitation, the status of your PayPal integration, whether you have an active PayPal account and whether you may already be working with a different PayPal integration partner).
- e. Disclose necessary information to the payment processors, auditors, customer services providers, credit reference and fraud agencies, financial products providers, commercial partners, marketing and public relations companies, operational services providers, group companies, agencies, marketplaces and other third parties listed here. The purpose of this disclosure is to allow us to provide PayPal Services to you. We also set out in the list of third parties, under each "Category", non-exclusive examples of the actual third parties (which may include their assigns and successors) to whom we currently disclose your Account Information or to whom we may consider disclosing your Account Information, together with the purpose of doing so, and the actual information we disclose (except as explicitly stated, these third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information was shared).
- f. Disclose necessary information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
- g. Disclose aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our users live in Manchester. However, this aggregated information is not tied to personal information.
- h. Share necessary Account Information with unaffiliated third parties (listed here) for their use for the following purposes:
  - i. <u>Fraud Prevention and Risk Management</u>: to help prevent fraud or assess and manage risk. For example, if you use the PayPal Services to buy or sell goods using eBay Inc. or its affiliates ("eBay"), we may share Account Information with eBay in order to help protect your accounts from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.
    - As part of our fraud prevention and risk management efforts, we also may share necessary Account Information with eBay in cases where PayPal has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share Account Information with eBay to enable them to operate their programmes for evaluating buyers or sellers.
  - ii. <u>Customer Service</u>: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
  - iii. Shipping: in connection with shipping and related services for purchases made using PayPal.
  - iv. Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
  - v. <u>Service Providers</u>: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

Mergers or Acquisitions: As with any other business, it is possible that in the future PayPal could merge with, or be acquired by, another company. If such an acquisition occurs, you consent to the successor company having access to the information maintained by PayPal, including customer Account Information, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

Third Party Sites: If you open a PayPal account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a PayPal website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayPal is not responsible for the content or information practices of such third parties.

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PayPal is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where 3:20 days 150 outside the payent information of 124

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#### 8. Your Use of Information and PayPal Services

In order to facilitate the transactions between PayPal users, PayPal Services allows you limited access other users' contact or delivery information. As a seller you may have access to the User ID, email address and other contact or delivery information of the buyer, and as a buyer you may have access to the User ID, email address and other contact information of the seller.

You agree that, with respect to other users' personally identifiable information that you obtain through the PayPal Services or through a PayPal-related communication or PayPal-facilitated transaction, you will only use this information for: (a) PayPal-related communications that are not unsolicited commercial messages, (b) ancillary actions in relation to the PayPal payments or the transactions for which PayPal has been used (e.g. insurance, delivery and fraud complaints), and (c) any other purpose that such user consents to after adequate disclosure of the purpose(s).

In all cases, you must provide users with the opportunity to remove their data from your database and review any information you have collected about them. More generally, you must comply with all applicable privacy regulations, in particular as they relate to the sending of marketing emails.

PayPal does not tolerate spam. We strictly enforce our Anti-Spam Policy. To report PayPal-related spam to PayPal, please contact: us.

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### 9. Information Security

PayPal is committed to handling your customer information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

For more information on PayPal's security practices, please see our Safety Advice.

The security of your PayPal account also relies on your protection of your PayPal password. You may not share your PayPal password with anyone. PayPal representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to **spoof@paypal.com**. If you do share your PayPal password with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also **contact us** right away.

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#### 10. Accessing and Changing Your Information

You can review the personal information you have provided us and make any desired changes to such information, or to the settings for your PayPal account, at any time by logging in to your account on the PayPal website, selecting My Account, then Profile and changing your preferences. You can also close your account through the PayPal website. If you close your PayPal account, we will mark your account in our database as "Closed", but will keep your Account Information in our database. This is for instance necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement authorities, or as required by law.

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#### 11. Accountability

Our privacy office is responsible for ensuring that our day-to-day procedures comply with this Privacy Policy. If you want to exercise your right to access your information or have any questions about this privacy statement, PayPal's information practices, or your dealings with

PayPal, you can contact us by using this form, or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us by using this form, or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us by using this form, or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us by using this form, or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us by using this form, or by calling the customer service number located on our website, or by writing to us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal Document of the Contact us at PayPal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal (Europe) S.à.r.I. et Gie, S.C.A., 2020/24 85 Ware Koyal (Europe) S.a. et al. (Europe) S.a. et a

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>> View all legal agreements

# PayPal Privacy Policy

Please note: The version of this Agreement marked "Current PayPal Privacy Policy" set out immediately below is effective until November 12, 2018. The version of this Agreement marked "Updated PayPal Privacy Statement" further below will take effect and supersede the Current PayPal Privacy Policy on November 13, 2018.

Current PayPal Privacy Policy

Effective Date: April 19, 2018

Print

Overview

What Personal Data Do We Collect?

Why Do We Retain Personal Data?

How Do We Process Personal Data?

Do We Share Personal Data?

How Do We Work with Other Services and Platforms?

How Do We Use Cookies and Tracking Technologies?

What Privacy Choices Are Available To You?

How Do We Protect Your Personal Data?

Can Children Use Our Services?

What Else Should You Know?

**Contact Us** 

**Definitions** 

I. Overview

PayPal has developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your Personal Case 3:20-cv-05991-SK Document 698-56 Filed 03/12/25 Page 34 of 124 Data when you visit our Sites or use our Services. This Privacy Policy applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other PayPal Users.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Policy. You can find the meaning of a capitalized term in the Definitions section.

If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Policy.

#### II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- Registration and use information When you register to use our Services by establishing an Account, we will collect
  Personal Data as necessary to offer and fulfill the Services you request. Depending on the Services you choose, we may
  require you to provide us with your name, postal address, telephone number, email address and identification
  information to establish an Account. We may require you to provide us with additional Personal Data as you use our
  Services.
- Transaction and experience information When you use our Services or access our Sites, for example, to make
  purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect
  information about the transaction, as well as other information associated with the transaction such as amount sent or
  requested, amount paid for products or services, merchant information, including information about any funding
  instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.
- Participant information When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
  - Send or request money: When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
  - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of someone else, or if
    you request a User to pay a bill for you, we collect Personal Data from you about the account holder such as name,
    postal address, telephone number, email address, and account number of the bill that you intend to pay or request
    to be paid.
  - Add value to your accounts: If you use our Services to add value to your Account or any other account you may
    have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the
    other party, or from the other party about you to facilitate the request. For example, if you use our Services to
    reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other
    information including mobile account number from the other participant.
- Information about your friends and contacts It may be easier for us to help you transact with your friends and
  contacts if you provide Personal Data such as name, email address and telephone number about your friends and
  contacts while using a Service or if you connect your contact list or friend list to your Account. If you choose to connect
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your contact list information on your device with your Account and/or establish an account connection between a social media platform and your Account, we will collect and use your contact list or friend list information to improve your experience when you use the Services.

- Information that you choose to provide us to obtain additional Services or specific online Services If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Policy.
- Information about you if you transact as a guest Certain limited Services are available without being required to log in to or establish an Account, also referred to as Guest Transactions. We will collect Personal Data, information about any funding instrument used to complete a Guest Transaction, Device Information, Technical Usage Data, and Geolocation Information as necessary to provide the requested Guest Transactions. If you are an Account holder and choose to make a Guest Transaction, we will collect information about the transaction and may associate it with your Account. If you are not an Account holder and choose to make a Guest Transaction, we will collect and store all information you provide and use and share such information in accordance with this Privacy Policy.
- Information about you from third-party sources We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

#### III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Policy.

#### IV. How Do We Process Personal Data?

We may Process your information for the following reasons:

- To operate the Sites and provide the Services, including to:
  - initiate a payment, send or request money, add value to an account, or pay a bill;
  - authenticate your access to an Account;
  - communicate with you about your Account, the Sites, the Services, or PayPal;
  - create an account connection between your Account and a third-party account or platform; and
  - perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes.
- To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites' performance and functionality. For example, we analyze User behavior and perform research about the way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity, and helping to detect and prevent fraud and abuse of the Sites or Services.
- To market to you by delivering marketing materials about PayPal products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences

to better match our understanding of your interests.

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- To provide personalized Services offered by PayPal on third-party websites and online services. We may use your
  Personal Data and other information collected in accordance with this Privacy Policy to provide a targeted display,
  feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these
  online services and/or work with other third-parties such as advertising or analytics companies to provide these online
  services.
- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the Sites and Services and provide you with location-based Services, such as advertising, search results, and other personalized content.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- To respond to your requests, for example to contact you about a question you submitted to our customer service team.

#### V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy. In addition, our Consumer Privacy Notice provides specific information about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

With other members of the PayPal corporate family: We may share your Personal Data with members of the PayPal family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of PayPal products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions that we have partnered with to jointly create and offer a product or service: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product, such as with Synchrony Bank in connection with the PayPal Extras credit card. These financial institutions may only use this information to market and offer PayPal-related products, unless you have given consent for other uses.

With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information with the other participants to your transactions, including other Users you are sending or receiving funds from, and merchants or their service providers when you use the Services to pay for goods or services. The information includes:

- Personal Data necessary to facilitate the transaction;
- information to help other participant(s) resolve disputes and detect and prevent fraud; and

aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance
 Users' experiences.
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With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for PayPal's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to PayPal or PayPal's corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of PayPal's business;
- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, PayPal may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

## VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of PayPal's Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Policy, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-PayPal account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PayPal and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or

• using your Account to make payments to a merchant or allowing a merchant to charge your Account.

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If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Policy.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that PayPal shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

## VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

## VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

- Choices Relating to the Personal Data We Collect
  - <u>Personal Data</u>. You may decline to provide Personal Data when it is requested by PayPal, but certain Services or all of the Services may be unavailable to you.
  - Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including Geolocation Information and User usage data that PayPal may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.
- Choices Relating to Our Use of Your Personal Data
  - Online Tracking and Interest-Based Advertising. We work with partners and third-party service providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related cookies and web beacons, in which case our advertising should not be targeted to you. You will continue to see our advertising on third party websites.

- For more information on third-party advertising-related cookies and interest-based advertising, and to learn Case 3:20-cv-05991-SK pocument 698-56. Filed 03/12/25 Page 39 of 124 how to opt-out of these practices with companies participating in industry self-regulation, please visit About Ads.
- Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at www.aboutads.info/appchoices.
- <u>Personalized Services offered by PayPal on third-party websites and services</u>. You may manage your preferences for
  other PayPal Services that are personalized and offered to you on third-party websites from your Account. We may
  also provide you with instructions and prompts on how to manage your preferences within the Service experience.
- <u>Finding and connecting with others</u>. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.
- Choices Relating to Sharing Your Personal Data
  - If you reside in the United States and have opened an Account for your own personal and family or household purposes, please see our Consumer Privacy Notice for additional information on opt out rights you may have and how to exercise these rights.
- Choices Relating to Account Connections
- If you authorize an account connection to a third-party account or platform, such as a social media account, you may be able to manage your connection preferences from your Account or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.
- Choices Relating to Cookies
  - You may have options available to manage your cookies preferences. For example, your browser or internet device
    may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by
    visiting AboutCookies.org. You may choose to enable these options, but doing so may prevent you from using many
    of the core features and functions available on a Service or Site.
  - You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit
    parts of a Site. For example, you may be asked if you want the Service or Site to "remember" certain things about
    you, and we will use cookies and other tracking technologies to the extent that you permit them.
  - You can learn more about our cookies and tracking technologies by visiting the Statement on Cookies and Tracking Technologies page.
- Choices Relating to Your Registration and Account Information
  - If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- Choices Relating to Communication
  - Notices, Alerts and Updates from Us:
    - Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the PayPal corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.

o Informational and Other: We will send communications to you that are required or necessary to send to Users of Case 3:20-cy-05991-SK Document 698-56. Filed 03/12/25 Page 40 of 124 our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

### IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

### X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

## XI. What Else Should You Know?

Changes to This Privacy Policy.

We may revise this Privacy Policy from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Policy if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

#### XII. Contact Us

You may contact us if you have general questions about our Privacy Policy and practices or questions about your Account information or Personal Data.

We want to make sure your questions go to the right place:

• Click here to contact us about your PayPal account

Click here to contact us about your Xoom account
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## XIII. Definitions

Account means a PayPal or Xoom member account.

Device Information means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Guest Transaction means a person's use of the Services without logging into and/or establishing an Account.

PayPal means PayPal, Inc. and subsidiaries or affiliates. In this Privacy Policy, PayPal is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

Process means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PayPal in connection with an Account or Guest Transaction.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which PayPal offers the Services and which has posted or linked to this Privacy Policy.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with PayPal (for example, by opening an Account and agreeing to the PayPal or Xoom User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Guest Transaction.

Effective Date: April 19, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
	The types of personal information we collect and share depend on the product or service you have with us. This information can include:
	Social Security number and account balances
What?	Payment history or transaction history
	Credit history or credit scores
	When you are no longer our customer, we continue to share your information as described in this notice.
	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their
How?	customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PayPal share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No

For our affiliates Centry day Chair ness pull polices — Document 698-56 Filed 03/12/25 information about your transactions and experiences		Filed 03/12/25 Pag Yes	e 43 of 124 No
For our affiliates' everyday business purposes — information about your creditworthiness		No	We don't share
For our affiliates to market to you		No	We don't share
For nonaffiliates to market to you		No	We don't share
Questions?	Gll our customer service at 1-8 https://www.paypal.com/us/selfl		

Questions?	https://www.paypal.com/us/selfhelp/contact/email/privacy.			
Who we are				
Who is providing this Privacy Policy?	This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.			
	What we do			
How does PayPal protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.			
How does PayPal collect my personal information?	<ul> <li>We collect your personal information, for example, when you</li> <li>open an account or provide account information</li> <li>use your credit or debit card or give us your contact information</li> <li>use your PayPal and/or Xoom account to send or receive funds</li> <li>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</li> </ul>			
Why can't   limit all sharing?	<ul> <li>Federal law gives you the right to limit only</li> <li>sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.</li> </ul>			

Definitions			
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.		
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.		
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  Our joint marketing partners include financial companies and banks, such as Synchrony Bank.		

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to https://www.paypal.com/selfhelp/home. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: BCPINFO@ag.state.nv.us.

Updated PayPal Privacy Statement. This version of the Statement will take effect on Nov 13, 2018. Changed text is shown underlined.

## PayPal Privacy Statement

Effective Date: November 13, 2018

>> View all legal agreements

## PayPal Privacy Statement

Effective Date: November 13, 2018



Overview

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How Do We Use Cookies and Tracking Technologies?

What Privacy Choices Are Available To You?

How Do We Protect Your Personal Data?

Can Children Use Our Services?

What Else Should You Know?

Contact Us

**Definitions** 

## I. Overview

PayPal has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other PayPal Users.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalized term in the Definitions section.

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If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Statement.

### II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- Registration and use information When you register to use our Services by establishing an Account, we will collect
  Personal Data as necessary to offer and fulfill the Services you request. Depending on the Services you choose, we may
  require you to provide us with your name, postal address, telephone number, email address and identification
  information to establish an Account. We may require you to provide us with additional Personal Data as you use our
  Services.
- Transaction and experience information When you use our Services or access our Sites, for example, to make
  purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect
  information about the transaction, as well as other information associated with the transaction such as amount sent or
  requested, amount paid for products or services, merchant information, including information about any funding
  instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.
- Participant information When you use our Services or access our Sites, we collect Personal Data you provide us about
  the other participants associated with the transaction.
  - Send or request money: When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
  - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of someone else, or if
    you request a User to pay a bill for you, we collect Personal Data from you about the account holder such as name,
    postal address, telephone number, email address, and account number of the bill that you intend to pay or request
    to be paid.
  - Add value to your accounts: If you use our Services to add value to your Account or any other account you may
    have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the
    other party, or from the other party about you to facilitate the request. For example, if you use our Services to
    reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other
    information including mobile account number from the other participant.
- Information about your friends and contacts It may be easier for us to help you transact with your friends and
  contacts if you provide Personal Data such as name, email address and telephone number about your friends and
  contacts while using a Service or if you connect your contact list or friend list to your Account. If you choose to connect
  your contact list information on your device with your Account and/or establish an account connection between a social
  media platform and your Account, we will collect and use your contact list or friend list information to improve your
  experience when you use the Services.
- Information that you choose to provide us to obtain additional Services or specific online Services If you request or
  participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect
  additional information from you. We will provide you with a separate notice at the time of collection, if the use of that
  information differs from the uses disclosed in this Privacy Statement.

- Information about you if you transact as a guest Certain limited Services are available without being required to log in to or establish an Account, also referred to as Guest Transactions. We will collect Personal Bata, information about any funding instrument used to complete a Guest Transaction, Device Information, Technical Usage Data, and Geolocation Information as necessary to provide the requested Guest Transactions. If you are an Account holder and choose to make a Guest Transaction, we will collect information about the transaction and may associate it with your Account. If you are not an Account holder and choose to make a Guest Transaction, we will collect and store all information you provide and use and share such information in accordance with this Privacy Statement.
- Information about you from third-party sources We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

## III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Statement.

#### IV. How Do We Process Personal Data?

We may Process your information for the following reasons:

- To operate the Sites and provide the Services, including to:
  - initiate a payment, send or request money, add value to an account, or pay a bill;
  - authenticate your access to an Account;
  - communicate with you about your Account, the Sites, the Services, or PayPal;
  - create an account connection between your Account and a third-party account or platform;
  - perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes; and
  - keep your Account and financial information up to date.
- To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites' performance
  and functionality. For example, we analyze User behavior and perform research about the way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity, and helping to detect
  and prevent fraud and abuse of the Sites or Services.
- To market to you by delivering marketing materials about PayPal products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences to better match our understanding of your interests.
- To provide personalized Services offered by PayPal on third-party websites and online services. We may use your
  Personal Data and other information collected in accordance with this Privacy Statement to provide a targeted display,
  feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these
  online services and/or work with other third-parties such as advertising or analytics companies to provide these online
  services.

- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information
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   through the Services. We will use this information to enhance the security of the Sites and Services and provide you
   with location-based Services, such as advertising, search results, and other personalized content.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all
  applicable laws and regulations.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service
  to suggest connections between you and people you may know. For example, we may associate information that we
  learn about you through your and your contacts' use of the Services, and information you and others provide to suggest
  people you may know or may want to transact with through our Services. Social functionality and features designed to
  simplify your use of the Services with others vary by Service.
- . To respond to your requests, for example to contact you about a question you submitted to our customer service team.

#### V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. In addition, our Consumer Privacy Notice provides specific information about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

With other members of the PayPal corporate family: We may share your Personal Data with members of the PayPal family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of PayPal products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product, such as with Synchrony Bank in connection with the PayPal Extras credit card. These financial institutions may only use this information to market and offer PayPal-related products, unless you have given consent for other uses. We may also share Personal Data to process transactions, provide you with benefits associated with your eligible cards, and keep your financial information up to date.

With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information with the other participants to your transactions, including other Users you are sending or receiving funds from, and merchants or their service providers when you use the Services to pay for goods or services. The information includes:

- Personal Data necessary to facilitate the transaction;
- · information to help other participant(s) resolve disputes and detect and prevent fraud; and
- aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for PayPal's business purposes or as permitted or required by law, including:

if we need to do so to comply with a law, legal process or regulations;

- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court
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   order or other legal process or requirement applicable to PayPal or PayPal's corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- · to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- · to protect our property, Services and legal rights;
- · to facilitate a purchase or sale of all or part of PayPal's business;
- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- · to credit reporting and collection agencies;
- · to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, PayPal may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

## VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of PayPal's Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-PayPal account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PayPal and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company
  with your Account log-in credentials; or
- using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with Case 3:20-cv-05991-SK Document 698-56 Filed 03/12/25 Page 50 of 124 the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that PayPal shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

## VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

## VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

- Choices Relating to the Personal Data We Collect
  - Personal Data. You may decline to provide Personal Data when it is requested by PayPal, but certain Services or all
    of the Services may be unavailable to you.
  - Location and other device-level information. The device you use to access the Sites or Services may collect
    information about you, including Geolocation Information and User usage data that PayPal may then collect and
    use. For information about your ability to restrict the collection and use of such information, please use the settings
    available in the device.
- Choices Relating to Our Use of Your Personal Data
  - Online Tracking and Interest-Based Advertising. We work with partners and third-party service providers to serve
    you advertising using ad-related cookies and web beacons. You can opt-out of third-party advertising-related
    cookies and web beacons, in which case our advertising should not be targeted to you. You will continue to see our
    advertising on third party websites.
    - For more information on third-party advertising-related cookies and interest-based advertising, and to learn
      how to opt-out of these practices with companies participating in industry self-regulation, please visit About
      Ads.
  - Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at www.aboutads.info/appchoices.
  - Personalized Services offered by PayPal on third-party websites and services. You may manage your preferences for other PayPal Services that are personalized and offered to you on third-party websites from your Account. We may

- also provide you with instructions and prompts on how to manage your preferences within the Service experience. Case 3:20-cv-05991-SK Document 698-56 Filed 03/12/25 Page 51 of 124
- Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.
- Choices Relating to Sharing Your Personal Data
  - If you reside in the United States and have opened an Account for your own personal and family or household purposes, please see our Consumer Privacy Notice for additional information on opt out rights you may have and how to exercise these rights.
- Choices Relating to Account Connections
- If you authorize an account connection to a third-party account or platform, such as a social media account, you may be
  able to manage your connection preferences from your Account or the third-party account or platform. Please refer to
  the privacy notice that governs the third-party platform for more information on the choices you may have.
- Choices Relating to Cookies
  - You may have options available to manage your cookies preferences. For example, your browser or internet device
    may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by
    visiting AboutCookies.org. You may choose to enable these options, but doing so may prevent you from using many
    of the core features and functions available on a Service or Site.
  - You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit
    parts of a Site. For example, you may be asked if you want the Service or Site to "remember" certain things about
    you, and we will use cookies and other tracking technologies to the extent that you permit them.
  - You can learn more about our cookies and tracking technologies by visiting the Statement on Cookies and Tracking Technologies page.
- Choices Relating to Your Registration and Account Information
  - If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- Choices Relating to Communication
  - Notices, Alerts and Updates from Us:
    - Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the PayPal corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
    - Informational and Other: We will send communications to you that are required or necessary to send to Users of
      our Services, notifications that contain important information and other communications that you request from
      us. You may not opt out of receiving these communications. However, you may be able to adjust the media and
      format through which you receive these notices.

## IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Case 3:20-cv-05991-SK. Document 698-56. Filed 03/12/25. Page 52 of 124 Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

## X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

## XI. What Else Should You Know?

Changes to This Privacy Statement.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Statement if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

#### XII. Contact Us

You may contact us if you have general questions about our Privacy Statement and practices or questions about your Account information or Personal Data.

We want to make sure your questions go to the right place:

- Click here to contact us about your PayPal account
- Click here to contact us about your Xoom account

## XIII. Definitions

Account means a PayPal or Xoom member account.

Device Information means data that can be automatically collected from any device used to access the Sites or Services. Case 3:20-cv-05991-SK. Document 698-56 Filed 03/12/25 Page 53 of 124 Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Guest Transaction means a person's use of the Services without logging into and/or establishing an Account.

PayPal means PayPal, Inc. and subsidiaries or affiliates. In this Privacy Statement, PayPal is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

Process means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PayPal in connection with an Account or Guest Transaction.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which PayPal offers the Services and which has posted or linked to this Privacy Statement.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with PayPal (for example, by opening an Account and agreeing to the PayPal or Xoom User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Guest Transaction.

## Consumer Privacy Notice

Effective Date: April 19, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
	The types of personal information we collect and share depend on the product or service you have with us. This information can include:
What?	Social Security number and account balances
	Payment history or transaction history
	Credit history or credit scores
	When you are no longer our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their
	customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PayPal share?	Can you limit this sharing?
For our everyday business purposes —	V	N-
such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —	Yes	No
to offer our products and services to you	163	
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes –	Yes	No
information about your transactions and experiences	res	NO
For our affiliates' everyday business purposes –	No	We don't share
information about your creditworthiness	NO.	we don't share

For our affiliates as market to y 05 991-SK	Document 698-56	Filed 03/12/25	NRage 55 of	₩24on't share
For nonaffiliates to market to you		No	We don't share	

Ouastians?	Call our customer service at 1-888-221-1161or visit us at
Questions?	https://www.paypal.com/us/selfhelp/contact/email/privacy.

Who we are		
Who is providing this Privacy <u>Statement</u> ?	This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.	
	What we do	
How does PayPal protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.	
How does PayPal collect my personal information?	We collect your personal information, for example, when you  open an account or provide account information  use your credit or debit card or give us your contact information  use your PayPal and/or Xoom account to send or receive funds  We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.	
Why can't I limit all sharing?	Federal law gives you the right to limit only  sharing for affiliates' everyday business purposes — information about your creditworthiness  affiliates from using your information to market to you  sharing for nonaffiliates to market to you  State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.	

	Definitions
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.

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Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  Our joint marketing partners include financial companies and banks, such as Synchrony Bank.

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to https://www.paypal.com/selfhelp/home. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: BCPINFO@ag.state.nv.us.

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The Wayback Machine - https://web.archive.org/web/20190826100348/https://www.paypal.com/us/webapps/...

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## **PayPal Privacy Statement**

Last Update: March 28, 2019

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#### I. Overview

<u>PayPal</u> has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your <u>Personal Data</u> when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit <u>Sites</u> or use <u>Services</u>, and does not apply to online websites or services that we do not own or control, including websites or services of other PayPal <u>Users</u>.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalized term in the <u>Definitions</u> section.

If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Statement.

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#### II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- Registration and use information When you register to use our Services by establishing an <u>Account</u>,
  we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the
  Services you choose, we may require you to provide us with your name, postal address, telephone number,
  email address and identification information to establish an Account. We may require you to provide us
  with additional Personal Data as you use our Services.
- Transaction and experience information When you use our Services or access our Sites, for example, to make purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, <a href="Device Information">Device Information</a>, <a href="Technical Usage Data">Technical Usage Data</a>, and <a href="Geolocation Information">Geolocation Information</a>.
- Participant information When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
  - Send or request money: When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
  - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of someone else, or if you request a User to pay a bill for you, we collect Personal Data from you about the account holder such as name, postal address, telephone number, email address, and account number of the bill that you intend to pay or request to be paid.
  - Add value to your accounts: If you use our Services to add value to your Account or any other account you may have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the other party, or from the other party about you to facilitate the request. For example, if you use our Services to reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.

- Information about your friends and contacts It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list information with your Account. If you choose to connect your contact list information on your device with your Account and/or establish an account connection between a social media platform and your Account, we will collect and use your contact list or friend list information to improve your experience when you use the Services.
- Information that you choose to provide us to obtain additional Services or specific online Services —
   If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Statement.
- Information about you if you use the Service "Checkout without a PayPal Account" Certain limited Services are available without being required to log in to or establish an Account, also referred to as Checkout without a PayPal Account. We will collect Personal Data, information about any funding instrument used, Device Information, Technical Usage Data, and Geolocation Information as necessary to complete the transaction. If you are an Account holder and choose to engage in a Checkout with a PayPal Account transaction, we will collect information about the transaction and may associate it with your Account. If you are not an Account holder and choose to engage in a Checkout without a PayPal Account transaction, we will collect and store all information you provide and use and share such information in accordance with this Privacy Statement.
- Information about you from third-party sources We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services We may collect additional
  information from or about you when you communicate with us, contact our customer support teams or
  respond to a survey.

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## III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Statement.

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#### IV. How Do We Process Personal Data?

We may <u>Process</u> your information for the following reasons:

- To operate the Sites and provide the Services, including to:
  - initiate a payment, send or request money, add value to an account, or pay a bill;
  - authenticate your access to an Account;
  - communicate with you about your Account, the Sites, the Services, or PayPal;

- create an account connection between your Account and a third-party account or platform;
- perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes; and
- keep your Account and financial information up to date.
- To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites'
  performance and functionality. For example, we analyze User behavior and perform research about the
  way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity.
   PayPal's risk and fraud tools use <u>Personal Data</u>, <u>Device Information</u>, <u>Technical Usage Data</u> and <u>Geolocation Information</u> from our Sites and websites that offer PayPal Services to help detect and prevent fraud and abuse of the Services.
- To market to you about PayPal products and Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor the marketing content and certain Services or Site experiences to better match our understanding of your interests on PayPal and other third-party websites.
- To provide personalized Services offered by PayPal on third-party websites and online services. We
  may use your Personal Data and other information collected in accordance with this Privacy Statement to
  provide a targeted display, feature, Services or offer to you on third-party websites. We may use cookies
  and other tracking technologies to provide these online services and/or work with other third-parties such
  as merchants, advertising or analytics companies to provide these online services.
- To provide you with location-specific options, functionality or offers if you elect to share your
  Geolocation Information through the Services. We will use this information to enhance the security of the
  Sites and Services and provide you with location-based Services, such as advertising, search results, and
  other personalized content.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- To respond to your requests, for example to contact you about a question you submitted to our customer service team.

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#### V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. In addition, our Consumer Privacy Notice provides specific information

about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

With other members of the PayPal corporate family: We may share your Personal Data with members of the PayPal family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of PayPal products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product, such as with Synchrony Bank in connection with the PayPal Extras credit card. These financial institutions may only use this information to market and offer PayPal-related products, unless you have given consent for other uses. We may also share Personal Data to process transactions, provide you with benefits associated with your eligible cards, and keep your financial information up to date.

With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information about you and your Account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from, and merchants and their service providers. The information might include:

- Personal Data and Account Information necessary to facilitate the transaction;
- information to help other participant(s) resolve disputes and detect and prevent fraud; and
- aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for PayPal's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to PayPal or PayPal's corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of PayPal's business;
- in connection with shipping and related services for purchases made using a Service;

- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use
  of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or
  other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- · to credit reporting and collection agencies;
- · to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, PayPal may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

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#### VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of PayPal's Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-PayPal account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PayPal and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that PayPal shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

#### VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

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#### VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

#### · Choices Relating to the Personal Data We Collect

- Personal Data. You may decline to provide Personal Data when it is requested by PayPal, but certain Services or all of the Services may be unavailable to you.
- Location and other device-level information. The device you use to access the Sites or Services
  may collect information about you, including Geolocation Information and User usage data that
  PayPal may then collect and use. For information about your ability to restrict the collection and
  use of such information, please use the settings available in the device.

#### Choices Relating to Our Use of Your Personal Data

- Online Tracking and Interest-Based Advertising. We work with partners and third-party service
  providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of
  third-party advertising-related cookies and web beacons, in which case our advertising should not
  be targeted to you. You will continue to see our advertising on third party websites.
  - For more information on third-party advertising-related cookies and interest-based advertising, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit <u>About Ads</u>.
- Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at <a href="https://www.aboutads.info/appchoices">www.aboutads.info/appchoices</a>.
- Personalized Services offered by PayPal on third-party websites and services. You may manage
  your preferences for other PayPal Services that are personalized and offered to you on third-party

websites from your Account. We may also provide you with instructions and prompts on how to manage your preferences within the Service experience.

 Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.

#### Choices Relating to Sharing Your Personal Data

If you reside in the United States and have opened an Account for your own personal and family or
household purposes, please see our Consumer Privacy Notice for additional information on opt out
rights you may have and how to exercise these rights.

#### Choices Relating to Account Connections

If you authorize an account connection to a third-party account or platform, such as a social media
account, you may be able to manage your connection preferences from your Account or the third-party
account or platform. Please refer to the privacy notice that governs the third-party platform for more
information on the choices you may have.

#### Choices Relating to Cookies

- You may have options available to manage your cookies preferences. For example, your browser or
  internet device may allow you delete, disable, or block certain cookies and other tracking
  technologies. You can learn more by visiting AboutCookies.org. You may choose to enable these
  options, but doing so may prevent you from using many of the core features and functions available
  on a Service or Site.
- You may have an option regarding the use of cookies and other tracking technologies when you use
  a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to
  "remember" certain things about you, and we will use cookies and other tracking technologies to the
  extent that you permit them.
- You can learn more about our cookies and tracking technologies by visiting the <u>Statement on Cookies and Tracking Technologies</u> page.

#### Choices Relating to Your Registration and Account Information

If you have an Account, you generally may review and edit Personal Data by logging in and
updating the information directly or by contacting us. <u>Contact us</u> if you do not have an Account or if
you have questions about your Account information or other Personal Data.

#### Choices Relating to Communication

#### Notices, Alerts and Updates from Us:

- Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the PayPal corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
- Informational and Other: We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information

and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

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#### IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

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#### X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

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#### XI. What Else Should You Know?

#### Changes to This Privacy Statement.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

#### Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Statement if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

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#### XII. Contact Us

You may contact us if you have general questions about our Privacy Statement and practices or questions about your Account information or Personal Data.

We want to make sure your questions go to the right place:

- Click <u>here</u> to contact us about your PayPal account
- Click here to contact us about your Xoom account

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#### XIII. Definitions

Account means a PayPal or Xoom member account.

**Device Information** means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Checkout without a PayPal Account means a person's use of the Services without logging into and/or establishing an Account.

PayPal means PayPal, Inc. and subsidiaries or affiliates. In this Privacy Statement, PayPal is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PayPal in connection with an Account or Checkout without a PayPal Account.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which PayPal offers the Services and which has posted or linked to this Privacy Statement.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you

have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with PayPal (for example, by opening an Account and agreeing to the PayPal or Xoom User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Checkout without a PayPal Account.

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#### XIV. Additional Information

The information provided in this section may be specific to customers depending on your region or how you use the Services. This information is provided to PayPal from third parties whom you may interact when using the Services.

#### Google ReCaptcha

PayPal uses ReCaptcha on the Sites and Services. Your use of ReCaptcha is subject to the Google <u>Privacy</u> <u>Policy</u> and <u>Terms of Use</u>.

ReCaptcha is only used to fight spam and abuse.

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#### **Consumer Privacy Notice**

Effective Date: April 19, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include:  • Social Security number and account balances  • Payment history or transaction history

	Credit history or credit scores  When you are no longer our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PayPal share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call our customer service at 1-888-221-1161or visit us at <a href="https://www.paypal.com/us/smarthelp/contact-us?email=privacy">https://www.paypal.com/us/smarthelp/contact-us?email=privacy</a> .
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	Who we are
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Who is providing this Privacy Statement?	This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.					
What we do						
How does PayPal protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.					
How does PayPal collect my personal information?	We collect your personal information, for example, when you  open an account or provide account information  use your credit or debit card or give us your contact information  use your PayPal and/or Xoom account to send or receive funds  We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.					
Why can't I limit all sharing?	Federal law gives you the right to limit only  • sharing for affiliates' everyday business purposes — information about your creditworthiness  • affiliates from using your information to market to you  • sharing for nonaffiliates to market to you  State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.					

	Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.	
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.	

	<ul> <li>Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.</li> </ul>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
•	<ul> <li>Our joint marketing partners include financial companies and banks, such as Synchrony Bank.</li> </ul>

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to <a href="https://www.paypal.com/selfhelp/home">https://www.paypal.com/selfhelp/home</a>. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.

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The Wayback Machine - https://web.archive.org/web/20191231050935/https://www.paypal.com/us/webapps/...
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>> View all legal agreements

# **PayPal Privacy Statement**

Please note: The version of this Agreement marked "PayPal Privacy Statement" set out immediately below is effective until December 31, 2019.

The version of this Agreement marked "Updated PayPal Privacy Statement – effective January 1, 2020" further below will take effect and supersede the Current PayPal Privacy Statement on January 1, 2020.



#### Jump to section:

I. Overview

II. What Personal Data Do We Collect?

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IV. How Do We Process Personal Data?

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#### I. Overview

<u>PayPal</u> has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your <u>Personal Data</u> when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit <u>Sites</u> or use <u>Services</u>, and does not apply to online websites or services that we do not own or control, including websites or services of other PayPal <u>Users</u>.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalized term in the <u>Definitions</u> section.

If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please contact us if you have questions about our privacy practices that are not addressed in this Privacy Statement.

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#### II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- Registration and use information When you register to use our Services by establishing an <u>Account</u>,
  we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the
  Services you choose, we may require you to provide us with your name, postal address, telephone number,
  email address and identification information to establish an Account. We may require you to provide us
  with additional Personal Data as you use our Services.
- Transaction and experience information When you use our Services or access our Sites, for example, to make purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, <a href="Device Information">Device Information</a>, <a href="Technical Usage Data">Technical Usage Data</a>, and <a href="Geolocation Information">Geolocation Information</a>.
- Participant information When you use our Services or access our Sites, we collect Personal Data you
  provide us about the other participants associated with the transaction.
  - Send or request money: When you send or request money through the Services, we collect
    Personal Data such as name, postal address, telephone number, and financial account information
    about the participant who is receiving money from you or sending money to you. The extent of
    Personal Data required about a participant may vary depending on the Services you are using to
    send or request money.
  - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of
    someone else, or if you request a User to pay a bill for you, we collect Personal Data from you
    about the account holder such as name, postal address, telephone number, email address, and
    account number of the bill that you intend to pay or request to be paid.
  - Add value to your accounts: If you use our Services to add value to your Account or any other
    account you may have, or if you ask a User to add value to any of these accounts, we may collect
    Personal Data from you about the other party, or from the other party about you to facilitate the

request. For example, if you use our Services to reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.

- Information about your friends and contacts It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list information with your Account. If you choose to connect your contact list information on your device with your Account and/or establish an account connection between a social media platform and your Account, we will collect and use your contact list or friend list information to improve your experience when you use the Services.
- Information that you choose to provide us to obtain additional Services or specific online Services –
   If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Statement.
- Information about you if you use the Service "Checkout without a PayPal Account" Certain limited Services are available without being required to log in to or establish an Account, also referred to as Checkout without a PayPal Account. We will collect Personal Data, information about any funding instrument used, Device Information, Technical Usage Data, and Geolocation Information as necessary to complete the transaction. If you are an Account holder and choose to engage in a Checkout with a PayPal Account transaction, we will collect information about the transaction and may associate it with your Account. If you are not an Account holder and choose to engage in a Checkout without a PayPal Account transaction, we will collect and store all information you provide and use and share such information in accordance with this Privacy Statement.
- Information about you from third-party sources We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services We may collect additional
  information from or about you when you communicate with us, contact our customer support teams or
  respond to a survey.

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## III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Statement.

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#### IV. How Do We Process Personal Data?

We may **Process** your information for the following reasons:

- To operate the Sites and provide the Services, including to:
  - initiate a payment, send or request money, add value to an account, or pay a bill;

- authenticate your access to an Account;
- communicate with you about your Account, the Sites, the Services, or PayPal;
- create an account connection between your Account and a third-party account or platform;
- perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes; and
- · keep your Account and financial information up to date.
- To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites'
  performance and functionality. For example, we analyze User behavior and perform research about the
  way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity.
   PayPal's risk and fraud tools use <u>Personal Data</u>, <u>Device Information</u>, <u>Technical Usage Data</u> and <u>Geolocation Information</u> from our Sites and websites that offer PayPal Services to help detect and prevent fraud and abuse of the Services.
- To market to you about PayPal products and Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor the marketing content and certain Services or Site experiences to better match our understanding of your interests on PayPal and other third-party websites.
- To provide personalized Services offered by PayPal on third-party websites and online services. We
  may use your Personal Data and other information collected in accordance with this Privacy Statement to
  provide a targeted display, feature, Services or offer to you on third-party websites. We may use cookies
  and other tracking technologies to provide these online services and/or work with other third-parties such
  as merchants, advertising or analytics companies to provide these online services.
- To provide you with location-specific options, functionality or offers if you elect to share your
  Geolocation Information through the Services. We will use this information to enhance the security of the
  Sites and Services and provide you with location-based Services, such as advertising, search results, and
  other personalized content.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to
  comply with all applicable laws and regulations.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- To respond to your requests, for example to contact you about a question you submitted to our customer service team.

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We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. In addition, our Consumer Privacy Notice provides specific information about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

With other members of the PayPal corporate family: We may share your Personal Data with members of the PayPal family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of PayPal products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product, such as with Synchrony Bank in connection with the PayPal Extras credit card. These financial institutions may only use this information to market and offer PayPal-related products, unless you have given consent for other uses. We may also share Personal Data to process transactions, provide you with benefits associated with your eligible cards, and keep your financial information up to date.

With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information about you and your Account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from, and merchants and their service providers. The information might include:

- Personal Data and Account Information necessary to facilitate the transaction;
- information to help other participant(s) resolve disputes and detect and prevent fraud; and
- aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for PayPal's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to PayPal or PayPal's corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of PayPal's business;

- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use
  of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or
  other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants;
- · to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, PayPal may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

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#### VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of PayPal's Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-PayPal account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PayPal and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that PayPal shares with a third-party account or platform such as a

social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

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### VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

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### VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

#### Choices Relating to the Personal Data We Collect

- Personal Data. You may decline to provide Personal Data when it is requested by PayPal, but certain Services or all of the Services may be unavailable to you.
- Location and other device-level information. The device you use to access the Sites or Services
  may collect information about you, including Geolocation Information and User usage data that
  PayPal may then collect and use. For information about your ability to restrict the collection and
  use of such information, please use the settings available in the device.

#### Choices Relating to Our Use of Your Personal Data

- Online Tracking and Interest-Based Advertising. We work with partners and third-party service
  providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of
  third-party advertising-related cookies and web beacons, in which case our advertising should not
  be targeted to you. You will continue to see our advertising on third party websites.
  - For more information on third-party advertising-related cookies and interest-based advertising, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit <u>About Ads</u>.
- Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at <a href="https://www.aboutads.info/appchoices">www.aboutads.info/appchoices</a>.

- Personalized Services offered by PayPal on third-party websites and services. You may manage
  your preferences for other PayPal Services that are personalized and offered to you on third-party
  websites from your Account. We may also provide you with instructions and prompts on how to
  manage your preferences within the Service experience.
- Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.

#### Choices Relating to Sharing Your Personal Data

If you reside in the United States and have opened an Account for your own personal and family or
household purposes, please see our Consumer Privacy Notice for additional information on opt out
rights you may have and how to exercise these rights.

#### Choices Relating to Account Connections

If you authorize an account connection to a third-party account or platform, such as a social media
account, you may be able to manage your connection preferences from your Account or the third-party
account or platform. Please refer to the privacy notice that governs the third-party platform for more
information on the choices you may have.

#### Choices Relating to Cookies

- You may have options available to manage your cookies preferences. For example, your browser or
  internet device may allow you delete, disable, or block certain cookies and other tracking
  technologies. You can learn more by visiting AboutCookies.org. You may choose to enable these
  options, but doing so may prevent you from using many of the core features and functions available
  on a Service or Site.
- You may have an option regarding the use of cookies and other tracking technologies when you use
  a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to
  "remember" certain things about you, and we will use cookies and other tracking technologies to the
  extent that you permit them.
- You can learn more about our cookies and tracking technologies by visiting the <u>Statement on Cookies and Tracking Technologies</u> page.

#### Choices Relating to Your Registration and Account Information

If you have an Account, you generally may review and edit Personal Data by logging in and
updating the information directly or by contacting us. <u>Contact us</u> if you do not have an Account or if
you have questions about your Account information or other Personal Data.

#### Choices Relating to Communication

#### Notices, Alerts and Updates from Us:

• Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the PayPal corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.

 Informational and Other: We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

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#### IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

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#### X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

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#### XI. What Else Should You Know?

#### Changes to This Privacy Statement.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

#### **Transfers of Your Personal Data to Other Countries**

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Statement if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

#### XII. Contact Us

You may contact us if you have general questions about our Privacy Statement and practices or questions about your Account information or Personal Data.

We want to make sure your questions go to the right place:

- · Click here to contact us about your PayPal account
- Click <u>here</u> to contact us about your Xoom account

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#### XIII. Definitions

Account means a PayPal or Xoom member account.

**Device Information** means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Checkout without a PayPal Account means a person's use of the Services without logging into and/or establishing an Account.

PayPal means PayPal, Inc. and subsidiaries or affiliates. In this Privacy Statement, PayPal is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PayPal in connection with an Account or Checkout without a PayPal Account.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which PayPal offers the Services and which has posted or linked to this Privacy Statement.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with PayPal (for example, by opening an Account and agreeing to the PayPal or Xoom User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Checkout without a PayPal Account.

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#### XIV. Additional Information

The information provided in this section may be specific to customers depending on your region or how you use the Services. This information is provided to PayPal from third parties whom you may interact when using the Services.

#### Google ReCaptcha

PayPal uses ReCaptcha on the Sites and Services. Your use of ReCaptcha is subject to the Google <u>Privacy</u> <u>Policy</u> and <u>Terms of Use</u>.

ReCaptcha is only used to fight spam and abuse.

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## **Consumer Privacy Notice**

Effective Date: April 19, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include:
	Social Security number and account balances
	Payment history or transaction history
	Credit history or credit scores

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	When you are no longer our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PayPal share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call our customer service at 1-888-221-1161or visit us at
	https://www.paypal.com/us/smarthelp/contact-us?email=privacy.

Who we are		
Who is providing this rivacy Statement?  This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.		
	What we do	
How does PayPal protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.	
We collect your personal information, for example, when you  open an account or provide account information  use your credit or debit card or give us your contact information  use your PayPal and/or Xoom account to send or receive funds  We also collect your personal information from others, such as credit to affiliates, or other companies.		
Why can't I limit all sharing?	Federal law gives you the right to limit only	

sharing for affiliates' everyday business purposes — information about your creditworthiness
affiliates from using your information to market to you
sharing for nonaffiliates to market to you
State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.

Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.	
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.	
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  • Our joint marketing partners include financial companies and banks, such as Synchrony Bank.	

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to <a href="https://www.paypal.com/selfhelp/home">https://www.paypal.com/selfhelp/home</a>. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.

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## **Updated PayPal Privacy Statement**

Effective January 1, 2020

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#### I. Overview

<u>PayPal</u> has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your <u>Personal Data</u> when you visit our Sites or use our Services. This Privacy Statement applies to your Personal Data when you visit <u>Sites</u> or use <u>Services</u>, and does not apply to online websites or services that we do not own or control, including websites or services of other PayPal <u>Users</u>.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please note that our Service offerings may vary by region.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalized term in the <u>Definitions</u> section.

If you are an individual who resides in the United States of America and opens an account for one of our Services for your own personal, family or household purposes, you should also review our Consumer Privacy Notice to understand our privacy practices and the privacy choices we offer you.

Please <u>contact us</u> if you have questions about our privacy practices that are not addressed in this Privacy Statement.

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#### II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- Registration and use information When you register to use our Services by establishing an <u>Account</u>,
  we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the
  Services you choose, we may require you to provide us with your name, postal address, telephone number,
  email address and identification information to establish an Account. We may require you to provide us
  with additional Personal Data as you use our Services.
- Transaction and experience information When you use our Services or access our Sites, for example, to make purchases from merchants, to receive money, to process payments, or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction, <a href="Device Information">Device Information</a>, <a href="Technical Usage Data">Technical Usage Data</a>, and <a href="Geolocation Information">Geolocation Information</a>.
- Participant information When you use our Services or access our Sites, we collect Personal Data you
  provide us about the other participants associated with the transaction.
  - Send or request money: When you send or request money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or request money.
  - Pay or request someone else to pay a bill: If you use our Services to pay a bill for the benefit of
    someone else, or if you request a User to pay a bill for you, we collect Personal Data from you
    about the account holder such as name, postal address, telephone number, email address, and
    account number of the bill that you intend to pay or request to be paid.
  - Add value to your accounts: If you use our Services to add value to your Account or any other account you may have, or if you ask a User to add value to any of these accounts, we may collect Personal Data from you about the other party, or from the other party about you to facilitate the request. For example, if you use our Services to reload a mobile phone, or to request value be added to your mobile account, we may collect Personal Data and other information including mobile account number from the other participant.
- Information about your friends and contacts It may be easier for us to help you transact with your friends and contacts if you choose to connect your contact list information with your Account. If you choose to connect your contact list information on your device with your Account and/or establish an account connection between a social media platform and your Account, we will collect and use your contact list or friend list information to improve your experience when you use the Services.
- Information that you choose to provide us to obtain additional Services or specific online Services –
   If you request or participate in an optional Site feature, or request enhanced Services or other elective

functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Statement.

- Information about you if you use the Service "Checkout without a PayPal Account" Certain limited Services are available without being required to log in to or establish an Account, also referred to as Checkout without a PayPal Account. We will collect Personal Data, information about any funding instrument used, Device Information, Technical Usage Data, and Geolocation Information as necessary to complete the transaction. If you are an Account holder and choose to engage in a Checkout with a PayPal Account transaction, we will collect information about the transaction and may associate it with your Account. If you are not an Account holder and choose to engage in a Checkout without a PayPal Account transaction, we will collect and store all information you provide and use and share such information in accordance with this Privacy Statement.
- Information about you from third-party sources We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.
- Other information we collect related to your use of our Sites or Services We may collect additional
  information from or about you when you communicate with us, contact our customer support teams or
  respond to a survey.

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#### III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Statement.

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#### IV. How Do We Process Personal Data?

We may <u>Process</u> your information for the following reasons:

- To operate the Sites and provide the Services, including to:
  - initiate a payment, send or request money, add value to an account, or pay a bill;
  - authenticate your access to an Account;
  - communicate with you about your Account, the Sites, the Services, or PayPal;
  - create an account connection between your Account and a third-party account or platform;
  - perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes; and
  - keep your Account and financial information up to date.

- To manage our business needs, such as monitoring, analyzing, and improving the Services and the Sites'
  performance and functionality. For example, we analyze User behavior and perform research about the
  way you use our Services.
- To manage risk and protect the Sites, the Services and you from fraud by verifying your identity.
   PayPal's risk and fraud tools use <u>Personal Data</u>, <u>Device Information</u>, <u>Technical Usage Data</u> and <u>Geolocation Information</u> from our Sites and websites that offer PayPal Services to help detect and prevent fraud and abuse of the Services.
- To market to you about PayPal products and Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor the marketing content and certain Services or Site experiences to better match our understanding of your interests on PayPal and other third-party websites.
- To provide personalized Services offered by PayPal on third-party websites and online services. We
  may use your Personal Data and other information collected in accordance with this Privacy Statement to
  provide a targeted display, feature, Services or offer to you on third-party websites. We may use cookies
  and other tracking technologies to provide these online services and/or work with other third-parties such
  as merchants, advertising or analytics companies to provide these online services.
- To provide you with location-specific options, functionality or offers if you elect to share your
  Geolocation Information through the Services. We will use this information to enhance the security of the
  Sites and Services and provide you with location-based Services, such as advertising, search results, and
  other personalized content.
- To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- To make it easier for you to find and connect with others, we may use your information you have shared with the Service to suggest connections between you and people you may know. For example, we may associate information that we learn about you through your and your contacts' use of the Services, and information you and others provide to suggest people you may know or may want to transact with through our Services. Social functionality and features designed to simplify your use of the Services with others vary by Service.
- To respond to your requests, for example to contact you about a question you submitted to our customer service team.

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#### V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Statement. In addition, our Consumer Privacy Notice provides specific information about the reasons why we share the Personal Data of certain United States residents with unaffiliated third parties.

We may share your Personal Data or other information for the following reasons:

With other members of the PayPal corporate family: We may share your Personal Data with members of the PayPal family of entities to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies

and agreements; and to help us manage the availability and connectivity of PayPal products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.

With other financial institutions: We may share Personal Data with other financial institutions that we have partnered with to jointly create and offer a product, such as with Synchrony Bank in connection with the PayPal Extras credit card. These financial institutions may only use this information to market and offer PayPal-related products, unless you have given consent for other uses. We may also share Personal Data to process transactions, provide you with benefits associated with your eligible cards, and keep your financial information up to date.

With the other parties to transactions when you use the Services, such as other Users, merchants, and their service providers: We may share information about you and your Account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from, and merchants and their service providers. The information might include:

- Personal Data and Account Information necessary to facilitate the transaction;
- information to help other participant(s) resolve disputes and detect and prevent fraud; and
- aggregated data and performance analytics to help merchants better understand Users and to help merchants enhance Users' experiences.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for PayPal's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to PayPal or PayPal's corporate family;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to facilitate a purchase or sale of all or part of PayPal's business;
- in connection with shipping and related services for purchases made using a Service;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.;
- to banking partners as required by card association rules for inclusion on their list of terminated merchants:

- to credit reporting and collection agencies;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, PayPal may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

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#### VI. How Do We Work with Other Services and Platforms?

A significant benefit and innovation of PayPal's Services is that you can connect your Account with a third-party account or platform. For the purposes of this Privacy Statement, an "account connection" with such a third-party is a connection you authorize or enable between your Account and a non-PayPal account, payment instrument, or platform that you lawfully control or own. When you authorize such a connection, PayPal and the third-party will exchange your Personal Data and other information directly. Examples of account connections include:

- linking your Account to a social media account or social messaging service;
- connecting your Account to a third-party data aggregation or financial services company, if you provide such company with your Account log-in credentials; or
- · using your Account to make payments to a merchant or allowing a merchant to charge your Account.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. For example, if you connect your Account to a social media account, we will receive Personal Data from the social media provider via the account connection. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Statement.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection. For example, Personal Data that PayPal shares with a third-party account or platform such as a social media account may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

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## VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other

online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

Please review our Statement on Cookies and Tracking Technologies to learn more about how we use Cookies.

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### VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Statement. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

#### Choices Relating to the Personal Data We Collect

- Personal Data. You may decline to provide Personal Data when it is requested by PayPal, but certain Services or all of the Services may be unavailable to you.
- Location and other device-level information. The device you use to access the Sites or Services
  may collect information about you, including Geolocation Information and User usage data that
  PayPal may then collect and use. For information about your ability to restrict the collection and
  use of such information, please use the settings available in the device.

#### Choices Relating to Our Use of Your Personal Data

- Online Tracking and Interest-Based Advertising. We work with partners and third-party service
  providers to serve you advertising using ad-related cookies and web beacons. You can opt-out of
  third-party advertising-related cookies and web beacons, in which case our advertising should not
  be targeted to you. You will continue to see our advertising on third party websites.
  - For more information on third-party advertising-related cookies and interest-based advertising, and to learn how to opt-out of these practices with companies participating in industry self-regulation, please visit <u>About Ads</u>.
- Mobile Device Tracking. You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at <a href="https://www.aboutads.info/appchoices">www.aboutads.info/appchoices</a>.
- Personalized Services offered by PayPal on third-party websites and services. You may manage
  your preferences for other PayPal Services that are personalized and offered to you on third-party
  websites from your Account. We may also provide you with instructions and prompts on how to
  manage your preferences within the Service experience.
- Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.

#### Choices Relating to Sharing Your Personal Data

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If you reside in the United States and have opened an Account for your own personal and family or
household purposes, please see our Consumer Privacy Notice for additional information on opt out
rights you may have and how to exercise these rights.

#### Choices Relating to Account Connections

If you authorize an account connection to a third-party account or platform, such as a social media
account, you may be able to manage your connection preferences from your Account or the third-party
account or platform. Please refer to the privacy notice that governs the third-party platform for more
information on the choices you may have.

#### · Choices Relating to Cookies

- You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You can learn more by visiting AboutCookies.org. You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.
- You may have an option regarding the use of cookies and other tracking technologies when you use
  a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to
  "remember" certain things about you, and we will use cookies and other tracking technologies to the
  extent that you permit them.
- You can learn more about our cookies and tracking technologies by visiting the <u>Statement on Cookies and Tracking Technologies</u> page.

#### · Choices Relating to Your Registration and Account Information

If you have an Account, you generally may review and edit Personal Data by logging in and
updating the information directly or by contacting us. <u>Contact us</u> if you do not have an Account or if
you have questions about your Account information or other Personal Data.

#### Choices Relating to Communication

- Notices, Alerts and Updates from Us:
  - Marketing: We may send you marketing content about our Sites, Services, products, products we jointly offer with financial institutions, as well as the products and services of unaffiliated third parties and members of the PayPal corporate family through various communication channels, for example, email, text, pop-ups, push notifications, and messaging applications. You may opt out of these marketing communications by following the instructions in the communications you receive. If you have an Account with us, you may also adjust your communication preferences in your Account settings. For messages sent via push notifications, you may manage your preferences in your device.
  - Informational and Other: We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

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#### IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

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#### X. Can Children Use Our Services?

The Sites and Services are not directed to children under the age of 13. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Sites and Services. If we obtain actual knowledge that we have collected Personal Data from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

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#### XI. What Else Should You Know?

#### Changes to This Privacy Statement.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the "Policy Update" page of our website. We also may notify Users of the change using email or other means.

#### Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in the United States and elsewhere in the world. We will protect your information as described in this Privacy Statement if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

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#### XII. Contact Us

You may contact us if you have general questions about our Privacy Statement and practices or questions about your Account information or Personal Data.

We want to make sure your questions go to the right place:

Click <u>here</u> to contact us about your PayPal account

Click <u>here</u> to contact us about your Xoom account

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#### XIII. Definitions

Account means a PayPal or Xoom member account.

**Device Information** means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

Geolocation Information means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

Checkout without a PayPal Account means a person's use of the Services without logging into and/or establishing an Account.

PayPal means PayPal, Inc. and subsidiaries or affiliates. In this Privacy Statement, PayPal is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by PayPal in connection with an Account or Checkout without a PayPal Account.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which PayPal offers the Services and which has posted or linked to this Privacy Statement.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

User means an individual who uses the Services or accesses the Sites and has established a relationship with PayPal (for example, by opening an Account and agreeing to the PayPal or Xoom User Agreement) or otherwise uses the Services as a buyer, seller or other type of participant to a transaction, including a Checkout without a PayPal Account.

#### XIV. Additional Information

The information provided in this section may be specific to customers depending on your region or how you use the Services. This information is provided to PayPal from third parties whom you may interact when using the Services.

#### Google ReCaptcha

PayPal uses ReCaptcha on the Sites and Services. Your use of ReCaptcha is subject to the Google <u>Privacy</u> <u>Policy</u> and <u>Terms of Use</u>.

ReCaptcha is only used to fight spam and abuse.

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## **Consumer Privacy Notice**

Effective Date: April 19, 2018

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?		
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
	The types of personal information we collect and share depend on the product or service you have with us. This information can include:  • Social Security number and account balances		
What?	<ul> <li>Payment history or transaction history</li> <li>Credit history or credit scores</li> <li>When you are no longer our customer, we continue to share your information as described in this notice.</li> </ul>		
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.		

Reasons we can share your personal information	Does PayPal share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call our customer service at 1-888-221-1161or visit us at <a href="https://www.paypal.com/us/smarthelp/contact-us?email=privacy">https://www.paypal.com/us/smarthelp/contact-us?email=privacy</a> .	
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Who we are		
Who is providing this Privacy <u>Statement</u> ?	This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.	
What we do		
How does PayPal protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.	
How does PayPal collect my personal information?	We collect your personal information, for example, when you  open an account or provide account information  use your credit or debit card or give us your contact information  use your PayPal and/or Xoom account to send or receive funds  We also collect your personal information from others, such as credit bureaus,	
	affiliates, or other companies.	
Why can't I limit all sharing?	<ul> <li>Federal law gives you the right to limit only</li> <li>sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.</li> </ul>	

Definitions			
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.		
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.		
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  Our joint marketing partners include financial companies and banks, such as Synchrony Bank.		

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

Vermont: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to <a href="https://www.paypal.com/selfhelp/home">https://www.paypal.com/selfhelp/home</a>. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.

#### California Consumer Privacy Act Notice

In this notice, we are addressing specific disclosure requirements under the California Consumer Privacy Act of 2018 for California residents. This notice should be read together with PayPal's Privacy Statement and applies to all California residents who visit our Sites or use the Services.

Personal Data Collection and Purposes of Use

We collect, use and share personal data regarding California residents as described in this notice.

We did not sell any consumers' personal data in the preceding 12 months.

#### California Residents' Privacy Rights

California residents have rights to request access to certain personal data collected about them over the past 12 months, or deletion of their personal data, subject to certain exceptions, and may not be discriminated against because they exercise their rights under the California Consumer Privacy Act. We may require you to provide additional personal data to verify your identity before we process your request; we may not process your request if we are unable to verify your identity.

You can make requests as follows:

- For PayPal Services, you may contact us by clicking here or call us at 1-888-221-1121.
- For Xoom Services, you may contact us by clicking here or call us at 1-877-815-1531

In the preceding 12 months, we have collected the following categories of personal data from California residents:	We have collected such personal data from the following categories of sources:	We collected such personal data to use for the following purposes:	In the preceding 12 months, we shared personal data with the following categories of third parties:
a. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	<ul> <li>from you when you use our Site and Services</li> <li>merchants</li> <li>partners</li> <li>financial institutions</li> <li>credit bureaus</li> <li>service providers</li> </ul>	<ul> <li>operate the Sites and provide Services</li> <li>initiate a payment, send or request money, add value to an account, or pay a bill</li> <li>authenticate your access to an Account</li> <li>communicate with you about your Account, the Sites, the Services, or PayPal</li> <li>create an account connection between your Account and a third-party account or platform</li> <li>perform creditworthiness and other financial standing check, evaluate applications, and compare information for accuracy and verification purposes</li> <li>keep your Account and financial information up to date</li> <li>manage our business needs, such as monitoring,</li> </ul>	<ul> <li>members of the PayPal corporate family</li> <li>partners</li> <li>financial institutions</li> <li>credit bureaus</li> <li>third party accounts or platforms</li> <li>parties to transactions when you use the Services, such as other Users, merchants, and their service providers</li> <li>third parties for our business purposes or as permitted or required by law</li> <li>service providers</li> </ul>

perform creditworthiness

standing check, evaluate

and other financial

any other financial

information, medical

merchants, and

their service

providers

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information, or health insurance information.		applications, and compare information for accuracy and verification purposes  • keep your Account and financial information up to date  • manage our business needs, such as monitoring, analyzing, and improving the Services and Sites' performance and functionality  • manage risk and protect the Sites, the Services and you from fraud by verifying your identity  • market to you about PayPal products and Services and the products and services of unaffiliated businesses  • provide personalized Services offered by PayPal on third-party websites and online  • comply with our obligations and to enforce the terms of our Sites and Services  • make it easier for you to find and connect with others  • respond to your requests	<ul> <li>third parties for our business purposes or as permitted or required by law</li> <li>service providers</li> </ul>
c. Personal data that is protected under California or federal law.	<ul> <li>from you when you use our Site and Services</li> <li>credit bureaus</li> <li>service providers</li> </ul>	<ul> <li>provide the Services</li> <li>perform creditworthiness and other financial standing check, evaluate applications, and compare information for accuracy and verification purposes</li> <li>manage our business needs, such as monitoring, analyzing, and improving</li> </ul>	<ul> <li>members of the PayPal corporate family</li> <li>third parties for our business purposes or as permitted or required by law</li> <li>service providers</li> </ul>

		the Services and Sites' performance and functionality  manage risk and protect the Sites, the Services and you from fraud by verifying your identity  market to you about PayPal products and Services and the products and services of unaffiliated businesses  comply with our obligations and to enforce the terms of our Sites and Services  respond to your requests	
d. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul> <li>from you when you use our Site and Services</li> <li>merchants</li> <li>partners</li> <li>financial institutions</li> <li>credit bureaus</li> <li>service providers</li> </ul>	<ul> <li>provide the Services</li> <li>initiate a payment, send or request money, add value to an account, or pay a bill</li> <li>communicate with you about your Account, the Sites, the Services, or PayPal</li> <li>perform creditworthiness and other financial standing check, evaluate applications, and compare information for accuracy and verification purposes</li> <li>manage our business needs, such as monitoring, analyzing, and improving the Services and Sites' performance and functionality</li> <li>manage risk and protect the Sites and Services</li> <li>market to you about PayPal products and Services and the products and services of unaffiliated businesses</li> </ul>	<ul> <li>members of the PayPal corporate family</li> <li>partners</li> <li>financial institutions</li> <li>credit bureaus</li> <li>third party accounts or platforms</li> <li>parties to transactions when you use the Services, such as other Users, merchants, and their service providers</li> <li>third parties for our business purposes or as permitted or required by law</li> <li>service providers</li> </ul>

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		<ul> <li>on third-party websites and online</li> <li>comply with our obligations and to enforce the terms of our Sites and Services</li> <li>respond to your requests</li> </ul>	
f. Geolocation data.	<ul> <li>from you if you allow us to collect this information</li> <li>service providers</li> </ul>	<ul> <li>provide the Services</li> <li>communicate with you about your Account, the Sites, the Services, or PayPal</li> <li>manage our business needs, such as monitoring, analyzing, and improving the Services and Sites' performance and functionality</li> <li>provide you with location-specific options, functionality or offers</li> <li>manage risk and protect the Sites and Services</li> <li>market to you about PayPal products and Services and the products and services of unaffiliated businesses</li> <li>comply with our obligations and to enforce the terms of our Sites and Services</li> </ul>	<ul> <li>members of the PayPal corporate family</li> <li>partners</li> <li>financial institutions</li> <li>third parties for our business purposes or as permitted or required by law</li> <li>service providers</li> </ul>
g. Audio, electronic, visual, thermal, olfactory, or similar data.	from you when you use our Site and Services	<ul> <li>provide the Services</li> <li>initiate a payment, send or request money, add value to an account, or pay a bill</li> <li>authenticate your access to an Account</li> </ul>	<ul> <li>members of the PayPal corporate family</li> <li>partners</li> <li>financial institutions</li> <li>credit bureaus</li> </ul>

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- communicate with you about your Account, the Sites, the Services, or PayPal
- create an account connection between your Account and a third-party account or platform
- perform creditworthiness and other financial standing check, evaluate applications, and compare information for accuracy and verification purposes
- keep your Account and financial information up to date
- manage our business needs, such as monitoring, analyzing, and improving the Services and Sites' performance and functionality
- manage risk and protect the Sites, the Services and you from fraud by verifying your identity
- market to you about PayPal products and Services and the products and services of unaffiliated businesses
- provide personalized Services offered by PayPal on third-party websites and online
- comply with our obligations and to enforce the terms of our Sites and Services
- make it easier for you to find and connect with others
- respond to your requests

- parties to transactions when you use the Services, such as other Users, merchants, and their service providers
- third parties for our business purposes or as permitted or required by law
- service providers

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The Wayback Machine - https://web.archive.org/web/20200317060355/https://www.paypal.com/us/webapps/...
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# **PayPal Privacy Statement**

Effective March 12, 2020

- I. Overview
- II. Your privacy rights and choices
  - a. Understanding your rights
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- III. The personal data we collect
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  - IX. Contact Us

#### Overview

This privacy statement explains how and why PayPal collects, stores, uses, and shares personal data when you visit our websites or use our services. Reading it will help you understand your privacy rights and choices.

"Personal data" in this statement means information about you, including your identity, finances, and online behavior.

"PayPal" in this statement means PayPal, Inc. This privacy statement only applies to the PayPal and Xoom services offered by PayPal. To learn about our privacy practices for our other products or services, like Venmo or Braintree, visit the website and review the privacy statement for that product or service.

#### Your privacy rights and choices

When it comes to how your personal data is collected, stored, used, and shared, you have rights and choices.

#### Understanding your rights

You have the right to request a copy of the personal data we've collected about you in the past 12 months. You also have the right to ask us to delete your personal data we have collected about you. If you want to see or delete your personal data, <u>contact us</u>. We will not deny you services, charge you different prices, or provide you with a different level of service solely for exercising your privacy rights.

If you request to see or delete your personal data, we'll first need to verify who you are before we can respond to your request. If we can't verify your identity, we will not be able to fulfill your request.

If you want to delete your personal data, you have choices:

- Log in to your account and delete information you previously added. For example, you can delete your profile picture and non-primary addresses in your settings
- · Call us and request that we delete specific information
- · Close your account

If you close your account or request that we delete personal data, we still need to keep some personal data so we can:

- Complete a transaction, provide goods or services you requested, or comply with our promises to you
  in the User Agreement or other contract you have with us
- · Detect and prevent malicious, fraudulent, or illegal activity
- Protect your (or another person's) legal rights, including the right to free speech
- Manage our internal business processes that are reasonably related to your expectations when using our services
- · Comply with laws

Depending on where you live and what type of account you use, you may have different rights and choices for managing your personal data. For example, certain State privacy laws do not apply to personal data collected, processed, or disclosed by a financial institution according to federal laws, such as the Gramm-Leach-Bliley Act. Consumers may read our <a href="Consumer Privacy Notice">Consumer Privacy Notice</a> for more information about their rights under US federal law.

#### Understanding your choices

You can control how personal data is collected or shared, as well as how we communicate with you. Here are some of the ways you can customize your choices.

#### Choose how we collect personal data

You may choose to limit the personal data you provide when our apps or services request it. To help make choices that are right for you, it's important to understand that personal data helps us provide a richer, more personalized experience for you. Also, some personal data is required for our services to function at all.

For example, sharing your contacts helps make it easier for you to find the people you want to send money to. If you choose not to share your contacts with us, you can still use our mobile apps, but some actions may not be as fast or easy as it would be if shared your contacts. Another example is creating an account with us. If you choose not to provide information that is required for an account to function, like your name and email address, we will not be able to create an account for you.

#### Choose how connected accounts collect and use personal data

If you connect your account to a third-party service, you may be able to manage how your personal data is collected, used, and shared by them. Read the third parties' privacy policies to see the choices they offer you.

You can control which third-party services you connect to your account and what personal data they can collect about you. For example, to manage the permissions, go to the Security settings in your PayPal account.

#### Choose how we communicate with you

Your choices about how we communicate with you differ depending on the purpose of the message and how it is delivered. Some messages are considered optional and some are necessary for you to manage your accounts with us. We use email, text messages, push notifications on your mobile device, and even paper mail depending on the situation and your preferences.

You can click the unsubscribe link in a marketing email, opt out of a text message by replying "STOP," or turn off notifications on your device. You can also change your account's notification settings or the notification preferences on your device.

You won't be able to opt out of messages that are considered necessary for you to manage your account, such as receipts and emails that alert you to changes in your account's status that require your attention. You may be able to decide how we send those messages, such as by email, text message, or a notification on your mobile device.

#### The personal data we collect

We may collect your personal data when you register for or use our services, such as when you create an account, make a payment, or make a purchase on a merchant's website.

If you use our services without creating or logging into an account, we'll still collect personal data, which may include your payment information, device information, and location. When you use our services without creating or logging into an account, we will use this information to process transactions, prevent fraud and comply with the law. We may connect this information with your account, if you have one.

Here are the kinds of personal data that we may collect when you create an account or use our services:

- 1. Information that identifies you, for example:
  - First and last name
  - Address
  - Phone number
  - Email
  - IP address
  - Information collected from cookies or other tracking technologies
- 2. Records and financial information, for example:
  - Social Security Number
  - Government-issued identification
  - Bank account and routing numbers
  - Credit and debit card information
  - Financial information
- 3. Personal characteristics, for example:
  - Age
  - National origin
  - Disability
  - Citizenship
  - Military status

- 4. Commercial information, for example:
  - · Online shopping cart information
  - · Purchase history
- 5. Internet or network activity, for example:
  - · Interactions with our services or sites
  - Shopping history
- 6. Geolocation data, for example:
  - Global Positioning System (GPS) information when you give us permission through your device settings
  - · IP-based geolocation
- 7. Audio, electronic, visual, or similar information, for example:
  - · Call recordings when you talk to customer service
  - · Photo IDs and profile pictures you provide
- 8. Professional or employment information, for example:
  - · Business information, contact emails and phone numbers
  - Tax IDs
- 9. Information we infer based on your personal data, for example:
  - Fraud and risk assessments
  - Personalization preferences

# Where personal data comes from

We may collect personal information about you from various sources, for example from:

- You
- Merchants
- Our payment partners, such as card networks and payment processors
- · Financial institutions, such as banks
- Credit bureaus
- Service providers, such as companies that help us manage risk and fraud, deliver services to you, and market our services

We do not knowingly collect personal information from people who are not allowed to use our sites and services, such as children under the age of 13. Contact us if you believe that we've mistakenly collected personal data from someone not allowed to use our services. We'll delete it immediately, unless we're legally required to keep it.

### How we use tracking technologies like cookies

We or our authorized service providers may use cookies and similar tracking technologies to collect personal data whenever you use our services, visit our sites, or visit websites that offer our services. The information

collected with these technologies helps us personalize your experience, measure the effect of our ads, prevent fraud and enhance the security of our sites and service.

You can disable or decline some cookies for our sites and services. But, since some parts of our service rely on cookies to work, those services could become difficult or impossible to use.

Some web browsers have an optional setting called "Do Not Track" (DNT) that lets you opt-out of being tracked by advertisers and some third parties. Because many of our services won't function without tracking data, we do not respond to DNT settings.

If you want to know more about how we use cookies, read our <u>Cookie Statement</u>. To learn how to opt-out of this kind of tracking technology, visit <u>About Ads</u>.

# Why we collect personal data

We collect personal data for many reasons, including to improve your experience, and to run our business. Specific reasons why we collect your personal data include:

- 1. Run our sites and provide better services, for example to help you send or request money, make purchases, show you your account information, verify access to your account, and keep your account and payment information up to date.
- Manage and improve our business. For example, we do user research to improve our products' performance and abilities. We also monitor and analyze our sites to help ensure they work as expected.
- 3. Protect our business and our customers from risk and fraud, including fraud that involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.
- 4. Send you marketing information about our products and services. We may use personal data to market about our partners, such as merchants. We use personal data to better understand and cater to your interests.
- Personalize your experience when you use our sites and services, as well as other third-party sites and services. In this case, we might use tracking technologies like cookies. See our <u>Cookie Statement</u> for more details.
- 6. Send you locally relevant options, but only if you agree to let us track your location. If you do, this can help us enhance the security of our sites and services, and customize our services by using the right language and personalizing content such as ads and search results.
- 7. Make it easy for you to find and connect with others. For instance, if you let us access your contacts, we can suggest connections with people you may know.
- 8. Contact you when you need us, such as answering a question you sent to our customer service team.
- 9. Comply with laws and enforce our agreements with you and other people who use our services.

# How and why we share personal data

We do not sell your personal data. However, we may share personal data across our services and with other members of the PayPal corporate family. Sometimes we share the personal data we collect with third parties to help us provide services, protect our customers from risk and fraud, market our products, and comply with legal obligations.

You can review the personal data that we may share by reviewing The personal data we collect section.

We may share personal data with:

1. Other members of the PayPal corporate family

#### 

- 2. Service providers that help us with processing payments, marketing, research, compliance, audits, corporate governance, communications, and security
- 3. Card networks and payment processors
- 4. Financial institutions, such as banks we partner with to offer joint products, like Synchrony Bank in connection with PayPal Credit, the PayPal Cashback Mastercard, and the PayPal Extras Mastercard
- 5. Credit reporting and collections agencies
- 6. Courts, governments, regulators and law enforcement when accompanied by a subpoena or other legal documentation that requires PayPal or members of our corporate family to respond
- 7. People involved in a transaction, such as other users or merchants and their service providers.
- 8. Third parties that you asked us to connect with, such as other financial or social media apps. If you want us to stop sharing information with a third party, disconnect your account from that third party.
- 9. Third-party tools used to help fight spam and abuse. For instance, we use ReCaptcha to help determine whether you're a person or a computer. When you use ReCaptcha, your personal data is subject to Google's Privacy Policy and Terms of Use.
- 10. Other third parties to:
  - · Comply with laws
  - o Investigate or enforce violations of our user agreement
  - · Facilitate a merger, purchase, or sale of part or all of our business
  - Comply with card association rules
  - · To prevent physical harm or illegal activity

# How we protect your personal data

Helping to keep your personal data safe against loss, misuse, unauthorized access, disclosure, and alteration is our top priority.

To protect your personal data, we use technical, physical, and administrative security measures that include:

- Firewalls
- Data encryption
- · Physical access controls at our data centers

While we protect our systems and services, you're responsible for keeping your password(s) and account information private. You are also responsible for making sure your personal information is accurate and up to date.

If your account is closed, we may keep your personal data and other information as required by law and according to our data retention policy. If we do, we'll continue to handle it as we describe in this statement.

# How this statement changes over time

We'll make changes to this privacy statement from time to time. This helps us stay up to date with changes to our business and the most current laws. After a new version is published, we'll collect, store, use, and protect your personal data as we outline in that revised statement.

If the new version reduces your rights or increases your responsibilities, we'll post it on the <u>Policy Updates or Privacy Statement</u> page of our website at least 21 days before it becomes effective.

We may notify you about these changes through email or other communications.

#### Contact Us

If you have questions about this privacy statement or your personal data, contact us so we can help.

To talk about your PayPal account:

- Call PayPal Customer Service at 1-888-221-1161
- or visit our Customer Service web portal

To talk about your Xoom account:

- Call Xoom Customer Service at 1-877-815-1531
- or visit our Help Center web portal

# **Consumer Privacy Notice**

Effective Date: March 12, 2020

This Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses PayPal sites or services for your own personal, family or household purposes.

FACTS	WHAT DOES PAYPAL DO WITH YOUR P	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?				
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.					
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include:  • Social Security number and account balances • Payment history or transaction history • Credit history or credit scores  When you are no longer our customer, we continue to share your information as described in this notice.					
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.					
Reasons	we can share your personal information	Does PayPal share?	Can you limit this sharing?			
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No			
For our marketing purposes – to offer our products and services to you		Yes	No			
For joint marketing with other financial companies		Yes	No			
For our affiliates' everyday business purposes – information about your transactions and experiences		Yes	No			

For our affiliates' everyday business purposes –			No	We don't share	
For our affiliates to market to you			No	We don't share	
For nonaffiliates to market to you			No	We don't share	
Questions?		Call our customer service at 1-888-221-1161or visit us at <a href="https://www.paypal.com/us/smarthelp/contact-us?email=privacy">https://www.paypal.com/us/smarthelp/contact-us?email=privacy</a> .			
		Who we are			
	Who is providing this Privacy Statement? This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.				
	•	What we do			
How does PayP personal inform	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.				
■ 1.20		<ul> <li>open an account or provide account information</li> <li>use your credit or debit card or give us your contact information</li> <li>use your PayPal and/or Xoom account to send or receive funds</li> <li>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</li> </ul>			
Why can't I limit all sharing?		Sharing for affiliates' everyday business purposes — information about your creditworthiness     affiliates from using your information to market to you     sharing for nonaffiliates to market to you  State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.			
	33	Definitions			
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.				
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.				
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.  Our joint marketing partners include financial companies and banks, such as Synchrony Bank.				

#### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: Effective January 1, 2020, the California Consumer Act of 2018 (CCPA) permits consumers who are California residents to ask businesses covered under the act about personal data it has collected about the consumer, submit an access or deletion request, and opt-out of the sale of personal information, if applicable. These provisions do not apply to personal data collected, processed, shared, or disclosed by financial institutions pursuant to federal law such as the Gramm-Leach-Bliley Act. Contact us if you have questions about our privacy statement, this consumer notice, or your personal data. If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

To talk about your PayPal account, call PayPal Customer Service at 1-888-221-1161 or visit our <u>Customer Service web portal</u>. To talk about your Xoom account, call Xoom Customer Service at 1-877-815-1531 or visit our <u>Help Center web portal</u>.

<u>Vermont</u>: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to <a href="https://www.paypal.com/selfhelp/home">https://www.paypal.com/selfhelp/home</a>. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: Aginfo@ag.nv.gov

- .
- Help
- Contact
- Fees
- Security
- Apps
- Shop
- About
- Newsroom
- Jobs
- Investor Relations
- Social Innovation
- Public Policy
- Sitemap
- Enterprise
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- Feedback

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PayPal
Log InSign Up

>> View all legal agreements

# **PayPal Privacy Statement**

Effective May 13, 2020

- I. Overview
- II. Your privacy rights and choices
  - a. Understanding your rights
  - b. Understanding your choices
- III. The personal data we collect
- IV. Where personal data comes from
  - a. How we use tracking technologies like cookies
- V. Why we collect personal data
- VI. How and why we share personal data
- VII. How we protect your personal data
- VIII. How this statement changes over time
  - IX. Contact Us

#### Overview

This privacy statement explains how and why PayPal collects, stores, uses, and shares personal data when you visit our websites or use our services. Reading it will help you understand your privacy rights and choices.

"Personal data" in this statement means information about you, including your identity, finances, and online behavior.

"PayPal" in this statement means PayPal, Inc. This privacy statement only applies to the PayPal and Xoom services offered by PayPal. To learn about our privacy practices for our other products or services, like Venmo or Braintree, visit the website and review the privacy statement for that product or service.

# Your privacy rights and choices

When it comes to how your personal data is collected, stored, used, and shared, you have rights and choices.

#### Understanding your rights

You have the right to request a copy of the personal data we've collected about you in the past 12 months. You also have the right to ask us to delete your personal data we have collected about you. If you want to see or delete your personal data, <u>contact us</u>. We will not deny you services, charge you different prices, or provide you with a different level of service solely for exercising your privacy rights.

If you request to see or delete your personal data, we'll first need to verify who you are before we can respond to your request. If we can't verify your identity, we will not be able to fulfill your request.

If you want to delete your personal data, you have choices:

- Log in to your account and delete information you previously added. For example, you can delete your profile picture and non-primary addresses in your settings
- · Call us and request that we delete specific information
- Close your account

If you close your account or request that we delete personal data, we still need to keep some personal data so we can:

- Complete a transaction, provide goods or services you requested, or comply with our promises to you
  in the User Agreement or other contract you have with us
- · Detect and prevent malicious, fraudulent, or illegal activity
- Protect your (or another person's) legal rights, including the right to free speech
- Manage our internal business processes that are reasonably related to your expectations when using our services
- · Comply with laws

Depending on where you live and what type of account you use, you may have different rights and choices for managing your personal data. For example, certain State privacy laws do not apply to personal data collected, processed, or disclosed by a financial institution according to federal laws, such as the Gramm-Leach-Bliley Act. Consumers may read our <a href="Consumer Privacy Notice">Consumer Privacy Notice</a> for more information about their rights under US federal law.

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If you use our services without creating or logging into an account, we'll still collect personal data, which may include your payment information, device information, and location. When you use our services without creating or logging into an account, we will use this information to process transactions, prevent fraud and comply with the law. We may connect this information with your account, if you have one or if you create an account at a later date.

Here are the kinds of personal data that we may collect when you create an account or use our services:

- 1. Information that identifies you, for example:
  - First and last name
  - Address
  - Phone number
  - Email
  - IP address
  - Information collected from cookies or other tracking technologies
- 2. Records and financial information, for example:
  - Social Security Number
  - Government-issued identification
  - Bank account and routing numbers
  - Credit and debit card information
  - Financial information
- 3. Personal characteristics, for example:
  - Age
  - National origin
  - Disability
  - Citizenship

- Military status
- 4. Commercial information, for example:
  - Online shopping cart information
  - Purchase history
- 5. Internet or network activity, for example:
  - · Interactions with our services or sites
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- 6. Geolocation data, for example:
  - Global Positioning System (GPS) information when you give us permission through your device settings
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### How we use tracking technologies like cookies

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We or our authorized service providers may use cookies and similar tracking technologies to collect personal data whenever you use our services, visit our sites, or visit websites that offer our services. The information collected with these technologies helps us personalize your experience, measure the effect of our ads, prevent fraud and enhance the security of our sites and service.

You can disable or decline some cookies for our sites and services. But, since some parts of our service rely on cookies to work, those services could become difficult or impossible to use.

Some web browsers have an optional setting called "Do Not Track" (DNT) that lets you opt-out of being tracked by advertisers and some third parties. Because many of our services won't function without tracking data, we do not respond to DNT settings.

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- 1. Run our sites and provide better services, for example to help you send or request money, make purchases, show you your account information, verify access to your account, and keep your account and payment information up to date.
- Manage and improve our business. For example, we do user research to improve our products' performance and abilities. We also monitor and analyze our sites to help ensure they work as expected.
- 3. Protect our business and our customers from risk and fraud, including fraud that involves our business partners, strategic ventures, or other individuals and merchants, such as eBay, Inc.
- 4. Send you marketing information about our products and services. We may use personal data to market about our partners, such as merchants. We use personal data to better understand and cater to your interests.
- Personalize your experience when you use our sites and services, as well as other third-party sites and services. In this case, we might use tracking technologies like cookies. See our <u>Cookie Statement</u> for more details.
- 6. Send you locally relevant options, but only if you agree to let us track your location. If you do, this can help us enhance the security of our sites and services, and customize our services by using the right language and personalizing content such as ads and search results.
- 7. Make it easy for you to find and connect with others. For instance, if you let us access your contacts, we can suggest connections with people you may know.
- 8. Contact you when you need us, such as answering a question you sent to our customer service team.
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#### 

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- 4. Financial institutions, such as banks we partner with to offer joint products, like Synchrony Bank in connection with PayPal Credit, the PayPal Cashback Mastercard, and the PayPal Extras Mastercard
- 5. Credit reporting and collections agencies
- Courts, governments, regulators and law enforcement when accompanied by a subpoena or other legal documentation that requires PayPal or members of our corporate family to respond
- 7. People involved in a transaction, such as other users or merchants and their service providers.
- 8. Third parties that you asked us to connect with, such as other financial or social media apps. If you want us to stop sharing information with a third party, disconnect your account from that third party.
- 9. Third-party tools used to help fight spam and abuse. For instance, we use ReCaptcha to help determine whether you're a person or a computer. When you use ReCaptcha, your personal data is subject to <u>Google's Privacy Policy</u> and <u>Terms of Use</u>.
- 10. Other third parties to:
  - Comply with laws
  - Investigate or enforce violations of our user agreement
  - · Facilitate a merger, purchase, or sale of part or all of our business
  - · Comply with card association rules
  - To prevent physical harm or illegal activity

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To talk about your Xoom account:

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- or visit our Help Center web portal

# **Consumer Privacy Notice**

Effective Date: March 12, 2020

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FACTS	WHAT DOES PAYPAL DO WITH YOUR PERSONAL INFORMATION?				
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.				
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include:  - Social Security number and account balances - Payment history or transaction history - Credit history or credit scores  When you are no longer our customer, we continue to share your information as described in this notice.				
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PayPal chooses to share; and whether you can limit this sharing.				
			Can you limit this sharing?		
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No		
For our marketing purposes – to offer our products and services to you		Yes	No		
For joint marketing w	ith other financial companies	Yes	No		

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For our affiliates' everyday business purposes – information about your transactions and experiences				Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness			No	We don't share	
For our affiliate	s to market to	you		No	We don't share
For nonaffiliate	s to market to	you		No	We don't share
Questions?			Call our customer service at 1-888-221-1161or visit us at <a href="https://www.paypal.com/us/smarthelp/contact-us?email=privacy">https://www.paypal.com/us/smarthelp/contact-us?email=privacy</a> .		
			Who we are		
		This privacy notice is provided by PayPal, Inc. and is applicable to your personal U.S. PayPal and/or Xoom accounts.			
			What we do		
How does PayPal protect my personal information from unauthorized access and use use security measures that comply with federal law. These measures in computer safeguards and secured files and buildings.					
17:50		open an account or provide account information     use your credit or debit card or give us your contact information     use your PayPal and/or Xoom account to send or receive funds  We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.			
Why can't I limit all sharing?		<ul> <li>sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>affiliates from using your information to market to you</li> <li>sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.			
		DII	Definitions	on your right.	and state law.
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.  • Our affiliates include Bill Me Later, Inc.				
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.  • Nonaffiliates with which we share personal information include service providers that perform services or functions on our behalf.				
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.				

 Our joint marketing partners include financial companies and banks, such as Synchrony Bank.

### Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: Effective January 1, 2020, the California Consumer Act of 2018 (CCPA) permits consumers who are California residents to ask businesses covered under the act about personal data it has collected about the consumer, submit an access or deletion request, and opt-out of the sale of personal information, if applicable. These provisions do not apply to personal data collected, processed, shared, or disclosed by financial institutions pursuant to federal law such as the Gramm-Leach-Bliley Act. Contact us if you have questions about our privacy statement, this consumer notice, or your personal data. If your PayPal account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law.

To talk about your PayPal account, call PayPal Customer Service at 1-888-221-1161 or visit our <u>Customer Service web portal</u>. To talk about your Xoom account, call Xoom Customer Service at 1-877-815-1531 or visit our <u>Help Center web portal</u>.

<u>Vermont</u>: If your PayPal account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

Nevada: If your PayPal account has a Nevada mailing address, we are providing this notice pursuant to Nevada law. If you prefer not to receive marketing calls from PayPal, you may be placed on our internal Do Not Call List by calling 1-888-221-1161 or going to <a href="https://www.paypal.com/selfhelp/home">https://www.paypal.com/selfhelp/home</a>. For more information, you can contact PayPal at 12312 Port Grace Blvd, La Vista, NE 68128 or you can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email: Aginfo@ag.nv.gov

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